1 2 3 4 5 6 7 8 9	WILMER CUTLER PICKERING HALE AND DORR LLP SONAL N. MEHTA (SBN 222086) Sonal.Mehta@wilmerhale.com 2600 El Camino Real, Suite 400 Palo Alto, California 94306 Telephone: (650) 858-6000 DAVID Z. GRINGER (pro hac vice) David.Gringer@wilmerhale.com ROSS E. FIRSENBAUM (pro hac vice) Ross.Firsenbaum@wilmerhale.com RYAN CHABOT (pro hac vice) Ryan.Chabot@wilmerhale.com PAUL VANDERSLICE (pro hac vice) Paul.Vanderslice@wilmerhale.com	ARI HOLTZBLATT (pro hac vice) Ari.Holtzblatt@wilmerhale.com MOLLY M. JENNINGS (pro hac vice) Molly.Jennings@wilmerhale.com 2100 Pennsylvania Ave NW Washington, DC 20037 Telephone: (202) 663-6000 MICHAELA P. SEWALL (pro hac vice) Michaela.Sewall@wilmerhale.com 60 State Street Boston, Massachusetts 02109 Telephone: (617) 526-6000		
10	7 World Trade Center			
11	250 Greenwich Street New York, New York 10007			
12	Telephone: (212) 230-8800			
13	Attorneys for Defendant Meta Platforms, Inc.			
14	UNITED STATES I	DISTRICT COURT		
15				
16	NORTHERN DISTRI			
17	SAN FRANCIS	CO DIVISION		
18	MAXIMILIAN KLEIN, et al., on behalf of themselves and all others similarly situated,	Case No. 3:20-cv-08570-JD		
19	Plaintiffs,	DECLARATION OF AMRISH ACHARYA IN SUPPORT OF OMNIBUS		
20	v.	MOTION TO SEAL MATERIALS		
21	META PLATFORMS, INC., a Delaware	SUBMITTED IN CONNECTION WITH CLASS CERTIFICATION AND		
22	Corporation headquartered in California,	DAUBERT BRIEFING		
23	Defendant.	Judge: Hon. James Donato		
24				
25				
26				
27				
28	No. 3:20-cv-08570-JD	DECLARATION OF AMRISH ACHARYA ISO		

OMNIBUS MOTION TO SEAL MATERIALS SUBMITTED IN CONNECTION WITH CLASS CERTIFICATION AND DAUBERT BRIEFING $28 \left\| \frac{1}{\text{No. } 3:20\text{-cv-}08570\text{-JD}} \right\|$

- 1. I, Amrish Acharya, declare as follows:
- 2. I am a Director of Finance at Meta Platforms, Inc. I have been employed by Meta since 2015 and have held my current title since 2021. Over the course of my employment at Meta, I have acquired personal knowledge of Meta's practices and procedures concerning the maintenance of the confidentiality of its strategic, business, financial, technical, and marketing information.
- 3. I respectfully submit this declaration in support of the Omnibus Motion to Seal Materials Submitted in Connection with the Class Certification and *Daubert* Briefing ("Sealing Motion"), filed on November 21, 2023 in *Klein v. Meta Platforms, Inc.*, Case No. 3:20-cv-08570-JD (N.D. Cal.).
- 4. The facts set forth in this declaration are true and correct to the best of my knowledge, information, and belief, and are based on my personal knowledge of Meta's policies and practices as they relate to the treatment of confidential information, materials that were provided to me and reviewed by me, or conversations with other knowledgeable employees of Meta. If called upon as a witness in this action, I could and would testify from my personal knowledge and knowledge acquired from sources with factual foundation.
- 5. All the material for which Meta requests sealing is maintained as highly confidential. To the best of my knowledge, none of this material has been publicly disclosed. As demonstrated with factual particularity below, there are compelling reasons and good cause to seal Meta's highly confidential materials.
- 6. For the reasons stated below, this information is highly sensitive, and if publicly disclosed, could significantly prejudice Meta's competitive position by harming Meta's relationships with business partners, developers, and advertisers, putting Meta at unfair disadvantage in future business negotiations, and permitting Meta's competitors to gain an unfair advantage in competition with Meta. For example, the public disclosure of Meta's internal, confidential material could reveal Meta's strategic decision-making and influence the business strategies employed by Meta's competitors by enabling them to mimic Meta's confidential

-1-

strategies in an effort to attract users or advertisers away from Meta. The disclosure of Meta's confidential material might also give a competitor or a potential business partner unfair leverage in competing against or negotiating with Meta.

- 7. As a matter of internal policy, Meta and its employees treat as strictly confidential: (1) nonpublic business dealings with third parties, including details of negotiation strategies or specific deal terms; (2) nonpublic financial data or information; (3) nonpublic pricing data or information; (4) nonpublic technical functionality of Meta's products and systems; (5) internal research or analyses, including proprietary methods for conducting that research or analysis; (6) nonpublic business strategies, including internal analyses or discussions of in-development or unreleased products, features, or future plans; and (7) other sensitive information that, if publicly disclosed, could prejudice Meta's business interests. In my experience and to the best of my knowledge, Meta does not disclose internal documents, data, or information of this nature outside of the company, except to authorized third parties when so required or permitted by law or contract.
- 8. The specific information Meta seeks to seal is identified in the tables below, with numbered rows for the Court's ease of reference:

EXPERT REPORTS

Row No.	Vanderslice Decl. Ex. No.	Portion of Document Sought to Be Sealed	Basis for Sealing			
Adver	Advertiser Class Rebuttal Report of Catherine Tucker, filed at Dkt. Nos. 642-6 (Ex. 79 659-5 (Ex. 3), 671-11 (Ex. 10), 675-4 (Ex. 3)					
1.	Exhibit B	¶ 35, including Exhibits 3, 4, and 5	This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the			

-2-

1 2	Row No.	Vanderslice Decl. Ex. No.	Portion of Document Sought to Be Sealed	Basis for Sealing
3 4 5 6				trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development or advertising business, which also arguably gives Meta's competitors an unfair advantage.
7 8 9 10 11 12 13 14 15	2.	Exhibit B	¶ 36	This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development or advertising business, which also arguably gives Meta's competitors an unfair advantage.
17 18 19 20 21 22 23 24 25	3.	Exhibit B	¶¶ 38-40, including Exhibit 7	This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development or advertising business, which also arguably gives Meta's competitors an unfair advantage.
26 27	4.	Exhibit B	n. 57	This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported

-3-

28 $\frac{1}{\text{No. } 3:20\text{-cv-}08570\text{-JD}}$

1 2	Row No.	Vanderslice Decl. Ex. No.	Portion of Document Sought to Be Sealed	Basis for Sealing
345				by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal,
6				non-public data to modify or augment their business operations in an effort to compete
7				unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight
8 9				into the financial health and future outlook of Meta's product development or advertising business, which also arguably gives Meta's
0				competitors an unfair advantage.
1	5.	Exhibit B	n. 58	This information reveals Meta's internal non- public profit, revenue, and financial calculations.
2				These data sets are not otherwise publicly reported by the company and their disclosure is likely to
} 				cause Meta competitive harm and give its competitors an unfair advantage. Meta's
5				competitors could improperly utilize this internal, non-public data to modify or augment their
5				business operations in an effort to compete unfairly against Meta. Moreover, visibility into the
				trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight
				into the financial health and future outlook of Meta's product development or advertising
				business, which also arguably gives Meta's competitors an unfair advantage.
	6.	Exhibit B	n. 59	This information reveals Meta's internal non-
				public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported
				by the company and their disclosure is likely to cause Meta competitive harm and give its
				competitors an unfair advantage. Meta's competitors could improperly utilize this internal,
				non-public data to modify or augment their business operations in an effort to compete
				unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple
				years) gives Meta's competitors improper insight into the financial health and future outlook of
	No. 3:20-c	ev-08570-JD		-4- DECLARATION OF AMRISH ACHARYA ISO

Row No.	Vanderslice Decl. Ex. No.	Portion of Document Sought to Be Sealed	Basis for Sealing
			Meta's product development or advertising business, which also arguably gives Meta's competitors an unfair advantage.
7.	Exhibit B	n. 60	This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development or advertising business, which also arguably gives Meta's competitors an unfair advantage.
8.	Exhibit B	¶ 44	This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development or advertising business, which also arguably gives Meta's competitors an unfair advantage.
9.	Exhibit B	¶ 45	This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's

-5-

 $\frac{1}{\text{No. } 3:20\text{-cv-}08570\text{-JD}}$

1 2	Row No.	Vanderslice Decl. Ex. No.	Portion of Document Sought to Be Sealed	Basis for Sealing
3 4 5				competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the
6				trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight
7 8				into the financial health and future outlook of Meta's product development or advertising business, which also arguably gives Meta's
9				competitors an unfair advantage.
10	10.	Exhibit B	Exhibit 10	This information reveals Meta's internal non-public profit, revenue, and financial calculations.
.1				These data sets are not otherwise publicly reported by the company and their disclosure is likely to
2				cause Meta competitive harm and give its competitors an unfair advantage. Meta's
3				competitors could improperly utilize this internal, non-public data to modify or augment their
14				business operations in an effort to compete unfairly against Meta. Moreover, visibility into the
15 16				trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight
17				into the financial health and future outlook of Meta's product development or advertising
18				business, which also arguably gives Meta's competitors an unfair advantage.
19	11.	Exhibit B	n. 182	This information contains confidential, non-public information regarding Meta's internal business
20				strategies and analyses, including summaries and discussions of Meta's internal modeling and
21				assessments of its products, services, or advertising platform that reveal competitively
22				sensitive information, including how users or
23				advertisers use and value Meta's products, services, or advertising platform, how they
24				operate, and potential improvements or other product changes. Disclosure of this non-public
25 26				information is likely to result in competitive harm to Meta, as it reveals strategic decision-making
27				which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta.
28	No. 3:20-c	v-08570-JD		-6- DECLARATION OF AMRISH ACHARYA ISO

1 2	Row No.	Vanderslice Decl. Ex. No.	Portion of Document Sought to Be Sealed	Basis for Sealing
3 4	12.	Exhibit B	¶ 81, including	This information reveals Meta's internal non- public profit, revenue, and financial calculations.
5			Exhibit 11	These data sets are not otherwise publicly reported by the company and their disclosure is likely to
6				cause Meta competitive harm and give its competitors an unfair advantage. Meta's
7				competitors could improperly utilize this internal, non-public data to modify or augment their
8				business operations in an effort to compete unfairly against Meta. Moreover, visibility into the
9				trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight
10				into the financial health and future outlook of Meta's product development or advertising
11 12				business, which also arguably gives Meta's competitors an unfair advantage.
13	13.	Exhibit B	¶ 124	This information contains confidential,
14				proprietary, and commercially sensitive information regarding the technical functionalities
15				and processes of Meta's ad auctions. This information has never been disclosed publicly and
16				Meta's product team treats it as strictly confidential. If publicly revealed, this information
17				could influence the competitive decision-making and business strategies employed by Meta's
18	1.4	E 171', D	220 6	competitors in advertising.
19	14.	Exhibit B	n. 239, from "The price"	This document describes confidential information on the functionality of Meta's advertising products
20 21			through "at - 345-347"	and services. This information contains confidential, proprietary, and commercially
22				sensitive information regarding the technical functionalities and processes of Meta's ad auction.
23				This information has never been disclosed publicly and Meta's product team treats it as strictly
24				confidential. If publicly revealed, this information could influence the competitive decisionmaking
25				and business strategies employed by Meta's competitors in advertising.
26	15.	Exhibit B	¶ 127 and footnotes 241	This text contains confidential, non-public information regarding an advertiser and implicates
27			and 242	their confidentiality interests, by revealing the

-7-

No. 3:20-cv-08570-JD

Row No.	Vanderslice Decl. Ex. No.	Portion of Document Sought to Be Sealed	Basis for Sealing
			identity of a Meta advertiser who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own
			confidential statements made during negotiations. Further, disclosure of this non-public information
			is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential
			advertiser unfair leverage in competing against or negotiating with Meta. Moreover, Meta's
			competitors could use this non-party information to unfairly target Meta's advertiser.
16.	Exhibit B	¶ 130	This information contains confidential, non-public information regarding Meta's internal business
			strategies and analyses, including summaries and
			discussions of Meta's internal modeling and assessments of its products, services, or
			advertising platform that reveal competitively sensitive information, including how users or
			advertisers use and value Meta's products, services, or advertising platform, how they
			operate, and potential improvements or other
			product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making
			which, for example, could give a developer, advertiser, or business partner unfair leverage in
			competing against or negotiating with Meta.
17.	Exhibit B	¶ 133	This information reveals Meta's internal non-public profit, revenue, and financial calculations.
			These data sets are not otherwise publicly reported
			by the company and their disclosure is likely to cause Meta competitive harm and give its
			competitors an unfair advantage. Meta's competitors could improperly utilize this internal,
			non-public data to modify or augment their business operations in an effort to compete
			unfairly against Meta. Moreover, visibility into the
			trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of
No. 3:20-c	ev-08570-JD	·	-8- DECLARATION OF AMRISH ACHARYA ISO

1 2	Row No.	Vanderslice Decl. Ex. No.	Portion of Document Sought to Be Sealed	Basis for Sealing
3 4				Meta's product development or advertising business, which also arguably gives Meta's competitors an unfair advantage.
5 6 7 8 9 10 11 12 13 14	18.	Exhibit B	n. 245	This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development or advertising business, which also arguably gives Meta's competitors an unfair advantage.
15 16 17 18 19 20 21 22 23	19.	Exhibit B	n. 258-262	This text contains confidential, non-public information regarding an advertiser and implicates their confidentiality interests, by revealing the identity of a Meta advertiser who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential advertiser unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's advertiser.
24252627	20.	Exhibit B	Exhibit E-1, p. E-5	This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's

-9-

28 $\frac{1}{\text{No. } 3:20-\text{cv-}08570-\text{JD}}$

1 2	Row No.	Vanderslice Decl. Ex. No.	Portion of Document Sought to Be Sealed	Basis for Sealing
3 4 5 6 7 8				competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development or advertising business, which also arguably gives Meta's competitors an unfair advantage.
9	User C	Lass Rebuttal Rep		e Tucker, filed at Dkt. Nos. 645-19, 663-4 (Ex. 5),
10	0.1	F 111 C		69-6 (Ex. 5)
11	21.	Exhibit C	¶ 84, from "A 2017 Ipsos" through the	This document describes future potential business plans with regard to unreleased products or features. This information contains confidential
13			end of the paragraph, &	non-public details of Meta's product functionality and strategic considerations related to feature
14			n. 168-171	development. This information has never been disclosed publicly and Meta's product team treats
15				it as strictly confidential. If publicly revealed, this information could influence the competitive
16				decision-making and business strategies employed by Meta's competitors.
17 18	22.	Exhibit C	¶ 85 & n.172	This text describes Meta's future potential business plans regarding user engagement and data
19				collection. This information contains confidential non-public details of Meta's product functionality
20				and strategic considerations related to feature development. This information has never been disclosed publicly and the Meta product team
21 22				treats it as strictly confidential. If publicly revealed, this information could influence the
23				competitive decision-making and business strategies employed by Meta's competitors.
24	23.	Exhibit C	¶ 127 & n.269	This document describes future potential business plans with regard to unreleased products or
25				features. This information contains confidential non-public details of Meta's product functionality
26 27				and strategic considerations related to feature development. This information has never been
21				disclosed publicly and Meta's product team treats

Row No.	Vanderslice Decl. Ex. No.	Portion of Document Sought to Be Sealed	Basis for Sealing
			it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors.
24.	Exhibit C	Exhibit 4 and notes (p. 121)	This text reflects user data calculated or derived from Meta's internal market research which is non-public information, and if revealed to competitors and potential business counterparties, could be used to disadvantage Meta. For example,
			if competitor platforms became aware of this information, they could use it to inform their own strategies, improperly leveraging Meta's user data in an effort to compete unfairly against Meta.
25.	Exhibit C	¶ 152	This information reflects and is calculated from internal, nonpublic Meta financial data. Meta spends significant resources compiling and
			maintaining this valuable data, which is non- public, and if revealed to competitors and potential business counterparties, could be used to
			disadvantage and cause Meta competitive harm by giving competitors insight into confidential Meta financial information. Further, this information
			reflects sensitive, highly confidential characterizations by Meta's internal business teams that, if revealed, could be referenced by
			potential counterparties in negotiations with Meta to gain an unfair advantage against Meta.
26.	Exhibit C	Exhibit 5 and notes (p. 123)	This information reflects and is calculated from internal, nonpublic Meta financial data. Meta spends significant resources compiling and
			maintaining this valuable data, which is non- public, and if revealed to competitors and potential
			business counterparties, could be used to disadvantage and cause Meta competitive harm by
			giving competitors insight into confidential Meta financial information. Further, this information
			reflects sensitive, highly confidential characterizations by Meta's internal business
			teams that, if revealed, could be referenced by potential counterparties in negotiations with Meta to gain an unfair advantage against Meta.
	24. 25.	No. Decl. Ex. No. 24. Exhibit C	Row No. Vanderslice Decl. Ex. No. 24. Exhibit C Exhibit 4 and notes (p. 121) 25. Exhibit C 4 152

-11-

28 $\frac{1}{\text{No. } 3:20-\text{cv-}08570-\text{JD}}$

Row No.	Vanderslice Decl. Ex. No.	Portion of Document Sought to Be Sealed	Basis for Sealing
]	Expert Report of	Yael Hochberg,	filed at Dkt. No. 657-3 (Ex. 1), 677-2 (Ex. 1)
27.	Exhibit D	¶ 50 (between "a code base that can grow and scale the company" and "Therefore, there is reason to believe…")	This text describes Meta's future and in-progress business plans with regards to its infrastructure. This information contains non-public and confidential data regarding unreleased advertising products and features development. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors market themselves to U.S. advertisers and how they distinguish themselves from Meta in the eyes of U.S. advertisers.
28.	Exhibit D	n. 76	This text describes Meta's future and in-progress
			business plans with regards to its infrastructure. This information contains non-public and
			confidential data regarding unreleased advertising products and features development. This
			information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making
			and business strategies employed by Meta's
			competitors, for example by influencing how those competitors market themselves to U.S. advertisers and how they distinguish themselves from Meta in the eyes of U.S. advertisers.
Reply	Report of Scott Fa	asser, filed at Dl	kt. Nos. 642-8 (Ex. B), 646-4 (Ex. 2), 647-4 (Ex. 2),
	T	60	67-3 (Ex. 2)
29.	Exhibit E	¶ 4, the final sentence	This information reveals Meta's internal non-public profit, revenue, and financial calculations.
			These data sets are not otherwise publicly reported by the company and their disclosure is likely to
			cause Meta competitive harm and give its competitors an unfair advantage. Meta's
			competitors could improperly utilize this internal, non-public data to modify or augment their
			business operations in an effort to compete
No. 3:20-	cv-08570-JD	<u> </u>	-12- DECLARATION OF AMRISH ACHARYA ISO

OMNIBUS MOTION TO SEAL MATERIALS SUBMITTED IN CONNECTION WITH CLASS CERTIFICATION AND DAUBERT BRIEFING

1 2	Row No.	Vanderslice Decl. Ex. No.	Portion of Document Sought to Be Sealed	Basis for Sealing
3 4 5 6				trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development or advertising business, which also arguably gives Meta's competitors an unfair advantage.
7 8 9	30.	Exhibit E	n. 2	This information reflects and is calculated from internal, nonpublic Meta financial data. Meta spends significant resources compiling and maintaining this valuable data, which is non-
10				public, and if revealed to competitors and potential business counterparties, could be used to
11				disadvantage and cause Meta competitive harm by giving competitors insight into confidential Meta
12				financial information. Further, this information reflects sensitive, highly confidential
13 14				characterizations by Meta's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Meta to gain an unfair advantage against Meta.
15 16 17 18 19 20 21	31.	Exhibit E	¶ 5	This information reveals Meta's internal non-public profit, revenue, and financial calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple
22 23 24				years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development or advertising business, which also arguably gives Meta's competitors an unfair advantage.
25 26 27	32.	Exhibit E	¶ 6, from "specific advertisement " through end	This information reveals Meta's internal non-public pricing information for advertising on Meta's products, including how those prices can be determined. This information is not otherwise publicly reported by the company and disclosure is

28 $\frac{1}{\text{No. } 3:20\text{-cv-}08570\text{-JD}}$

1 2	Row No.	Vanderslice Decl. Ex. No.	Portion of Document Sought to Be Sealed	Basis for Sealing
3 4 5 6			of paragraph.	likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public information to modify or augment their business operations in an effort to compete unfairly against Meta.
7 8 9 10 11 12 13 14 15	33.	Exhibit E	n. 4	This information contains confidential, non-public information regarding Meta's internal business strategies and analyses, including summaries and discussions of Meta's internal modeling and assessments of its products, services, or advertising platform that reveal competitively sensitive information, including how advertisers use and value Meta's advertising platform, how they operate, and potential improvements or other product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an advertiser unfair leverage in competing against or negotiating with Meta.
16 17 18 19 20 21 22 23	34.	Exhibit E	n. 5	This information reflects and is calculated from internal, nonpublic Meta financial data. Meta spends significant resources compiling and maintaining this valuable data, which is nonpublic, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Meta competitive harm by giving competitors insight into confidential Meta financial information. Further, this information reflects sensitive, highly confidential characterizations by Meta's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Meta to gain an unfair advantage against Meta.
24252627	35.	Exhibit E	n. 6	This information reveals Meta's internal non-public pricing information for advertising on Meta's products or services, including how those prices can be determined. This information is not otherwise publicly reported by the company and disclosure is likely to cause Meta competitive

1 2	Row No.	Vanderslice Decl. Ex. No.	Portion of Document Sought to Be Sealed	Basis for Sealing
3 4 5				harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public information to modify or augment their business operations in an effort to compete unfairly against Meta.
6	36.	Exhibit E	n. 8	This information contains non-public and confidential data regarding advertiser monetization strategies on Meta's produces or services. This information has never been disclosed publicly and the Meta product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors market themselves to U.S. advertisers and how they distinguish themselves from Meta in the eyes of U.S. advertisers.
14 15 16 17 18 19 20	37.	Exhibit E	n. 9	This information contains non-public and confidential data regarding advertiser monetization strategies on Meta's produces or services. This information has never been disclosed publicly and the Meta product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors market themselves to U.S. advertisers and how they distinguish themselves from Meta in the eyes of U.S. advertisers.
21 22 23 24 25 26	38.	Exhibit E	n. 10	This information reveals Meta's internal non-public pricing information for advertising on Meta's products or services, including how those prices can be determined. This information is not otherwise publicly reported by the company and disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public information to modify or augment their business operations in an effort to compete unfairly against Meta.

28 $\frac{1}{\text{No. } 3:20-\text{cv-}08570-\text{JD}}$

1 2	Row No.	Vanderslice Decl. Ex. No.	Portion of Document Sought to Be Sealed	Basis for Sealing
3	39.	Exhibit E	n. 11	This information contains non-public and
5				confidential data regarding advertiser monetization strategies on Meta's produces or services. This information has never been disclosed publicly and
6				the Meta product team treats it as strictly confidential. If publicly revealed, this information
7				could influence the competitive decision-making and business strategies employed by Meta's
8 9				competitors, for example by influencing how those competitors market themselves to U.S. advertisers and how they distinguish themselves from Meta in
10				the eyes of U.S. advertisers.
11	40.	Exhibit E	¶ 9, from "threshold"	This text contains confidential, non-public information regarding an advertiser and implicates
12			through the	their confidentiality interests, by revealing the
13			end of the paragraph	identity of a Meta advertiser who is not party to this litigation, and who has a reasonable
14				expectation that Meta will maintain the confidentiality of contractual terms and its own
15				confidential statements made during negotiations. Further, disclosure of this non-public information
16				is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for
17				example, could give a competitor or potential
18				business partner unfair leverage in competing against or negotiating with Meta. Moreover,
19				Meta's competitors could use this non-party information to unfairly target Meta's advertiser.
20	41.	Exhibit E	¶ 10	This information contains non-public and
21				confidential data regarding advertiser monetization strategies on Meta's produces or services. This
22				information has never been disclosed publicly and the Meta product team treats it as strictly
23				confidential. If publicly revealed, this information could influence the competitive decision-making
24				and business strategies employed by Meta's
25				competitors, for example by influencing how those competitors market themselves to U.S. advertisers
26				and how they distinguish themselves from Meta in the eyes of U.S. advertisers.
27		1	<u> </u>	

28 $\frac{1}{\text{No. } 3:20\text{-cv-}08570\text{-JD}}$

1 2	Row No.	Vanderslice Decl. Ex. No.	Portion of Document Sought to Be Sealed	Basis for Sealing
3 4	42.	Exhibit E	¶ 11	This information reveals Meta's internal non- public pricing information for advertising on
5				Meta's products or services, including how those prices can be determined. This information is not
6				otherwise publicly reported by the company and disclosure is likely to cause Meta competitive
7				harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this
8				internal, non-public information to modify or augment their business operations in an effort to
9				compete unfairly against Meta
10		Exhibit E	¶ 13, between "cites	This text contains confidential, non-public information regarding an advertiser and implicates
11 12			agreements with" and	their confidentiality interests, by revealing the identity of a Meta advertiser who is not party to
13			"Prof. Tucker's	this litigation, and who has a reasonable expectation that Meta will maintain the
14			citations"	confidentiality of contractual terms and its own confidential statements made during negotiations.
15				Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as
16				it reveals strategic decision-making, which, for example, could give a competitor or potential
17				business partner unfair leverage in competing against or negotiating with Meta. Moreover,
18 19				Meta's competitors could use this non-party information to unfairly target Meta's advertiser.
20	-	-		filed at Dkt. Nos. 642-10 (Ex. A), 646-8 (Ex. 6), 0, 661-2 (Ex. 1), 671-5 (Ex. 4), 675-5 (Ex. 4), 677-4 (Ex. 3)
21	43.	Exhibit F	¶ 46	This document describes Meta's future potential
22 23				business plans regarding the data and AI/ML systems used for advertising. This information contains confidential, proprietary, and
24				commercially sensitive information regarding the
25				technical functionalities and processes of Meta's ad auction, ad targeting and delivery systems, or
26				data tables. This information has never been disclosed publicly and Meta's product team treats
27				it as strictly confidential. If publicly revealed, this information could influence the competitive
28				

Row No.	Vanderslice Decl. Ex. No.	Portion of Document Sought to Be Sealed	Basis for Sealing
			decision-making and business strategies employed by Meta's competitors in advertising.
44.	Exhibit F	¶ 316	This text contains confidential, non-public information regarding Meta's internal business strategies and analyses, including summaries and discussions of Meta's internal modeling and assessments of its products that reveal competitively sensitive information, including how they operate, and potential improvements or other product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an ad venue unfair leverage in competing against Meta.
45.	Exhibit F	¶ 317	This document describes Meta's future potential business plans regarding the data and AI/ML systems used for advertising. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction, ad targeting and delivery systems, or data tables. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
Rep			filed at Dkt. Nos. 642-10 (Ex. B), 657-7 (Ex. 9), (c. 2), 671-7 (Ex. 6), 675-10 (Ex. 9)
46.	Exhibit G	¶ 52, between	This text reflects and is calculated from internal,
		"her claim is that" and	nonpublic Meta financial data. Meta spends significant resources compiling and maintaining
		"Thus, Dr. Tucker's" and	this valuable data, which is non-public, and if revealed to competitors and potential business
		n. 36	counterparties, could be used to disadvantage and cause Meta competitive harm by giving
			competitors insight into confidential Meta financial information. Further, this information
			reflects sensitive, highly confidential characterizations by Meta's internal business teams that, if revealed, could be referenced by
No. 3:20-	-cv-08570-JD	•	-18- DECLARATION OF AMRISH ACHARYA IS

	Row No.	Vanderslice Decl. Ex. No.	Portion of Document Sought to Be Sealed	Basis for Sealing
				potential counterparties in negotiations with Meta to gain an unfair advantage against Meta.
	47.	Exhibit G	n. 48	This text contains confidential, non-public information regarding Meta's internal business strategies and analyses, including summaries and discussions of Meta's internal modeling and assessments of its advertising platform that reveal competitively sensitive information, including how advertisers use and value Meta's products, services, or advertising platform, how they operate, and potential improvements or other product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an ad venue unfair leverage in competing against or negotiating with Meta.
	48.	Exhibit G	¶ 132 and n. 151	This text reveals Meta's internal non-public pricing information for advertising on Meta's products or services, including how those prices can be determined. This information is not otherwise publicly reported by the company and disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public information to modify or augment their business operations in an effort to compete unfairly against Meta.
E	xpert			Okt. Nos. 642-14 (Ex. A), 646-4 (Ex. 4), 647-6 (Ex. 665-2 (Ex. 1), 671-8 (Ex. 7), 675-8 (Ex. 7)
	49.	Exhibit H	¶ 62	This information contains confidential, non-public information regarding Meta's internal business
				strategies and analyses, including summaries and discussions of Meta's internal modeling and
				assessments of its products, services, or advertising platform that reveal competitively sensitive information, including how users or
				advertisers use and value Meta's products, services, or advertising platform, how they
				operate, and potential improvements or other product changes. Disclosure of this non-public
No.	. 3:20-c	v-08570-JD		-19- DECLARATION OF AMRISH ACHARYA ISO

1 2	Row No.	Vanderslice Decl. Ex. No.	Portion of Document Sought to Be Sealed	Basis for Sealing
3 4 5 6				information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta.
7 8 9 10 11 12 13 14	50.	Exhibit H	¶ 66	This information contains confidential, non-public information regarding Meta's internal business strategies and analyses, including summaries and discussions of Meta's internal modeling and assessments of its products that reveal competitively sensitive information, including how users use and value Meta's products, how they operate, and potential improvements or other product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta.
15 16 17 18 19 20 21 22	51.	Exhibit H	¶ 67, between "indicates that" and "A Snapchat executive"	This information contains confidential, non-public information regarding Meta's internal business strategies and analyses, including summaries and discussions of Meta's internal modeling and assessments of its products that reveal competitively sensitive information, including how users use and value Meta's products, how they operate, and potential improvements or other product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta.
23 24 25 26 27	52.	Exhibit H	¶ 68	This information contains confidential, non-public information regarding Meta's internal business strategies and analyses, including summaries and discussions of Meta's internal modeling and assessments of its products that reveal competitively sensitive information, including how users use and value Meta's products, how they operate, and potential improvements or other

1 2	Row No.	Vanderslice Decl. Ex. No.	Portion of Document Sought to Be Sealed	Basis for Sealing
3 4 5 6				product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta.
7 8 9 10 11 12 13 14 15	53.	Exhibit H	¶ 82, after "appears at PALM- 002014263" through end of paragraph	This information contains confidential, non-public information regarding Meta's internal business strategies and analyses, including summaries and discussions of Meta's internal modeling and assessments of its products and services that reveal competitively sensitive information, including how developers use and value Meta's products and services, how they operate, and potential improvements or other product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer unfair leverage in competing against or negotiating with Meta.
16 17 18 19 20 21 22 23 3	54.	Exhibit H	¶ 83, first sentence	This information contains confidential, non-public information regarding Meta's internal business strategies and analyses, including summaries and discussions of Meta's internal modeling and assessments of its products that reveal competitively sensitive information, including how users use and value Meta's products, how they operate, and potential improvements or other product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta.
24252627	55.	Exhibit H	¶ 90	This text contains confidential, non-public information regarding an advertiser and implicates their confidentiality interests, by revealing the identity of a Meta advertiser who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the

-21-

8 No. 3:20-cv-08570-JD

Row No.	Vanderslice Decl. Ex. No.	Portion of Document Sought to Be Sealed	Basis for Sealing
			confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's advertiser.
56.	Exhibit H	¶ 103	This text describes Meta's future potential busines plans regarding the data and AI/ML systems used for advertising. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction ad targeting and delivery systems, or data tables. This information has never been disclosed publicl and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
Expert	Report of Nicho		filed at Dkt. Nos. 645-5, 651-4 (Ex. 1), 652-3 (Ex Ex. 1), 669-7 (Ex. 6)
57.	Exhibit I	Section X.D.2	This document describes future potential business plans with regard to unreleased products or features. This information contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors.
Reply	Report of Nicho		filed at Dkt Nos. 645-6, 651-5 (Ex. 2), 652-4 (Ex. x. 4), 669-14 (Ex. 13)
58.	Exhibit J	¶ 92	This document describes future potential business

 $\frac{1}{\text{No. } 3:20\text{-cv-}08570\text{-JD}}$

1 2	Row No.	Vanderslice Decl. Ex. No.	Portion of Document Sought to Be Sealed	Basis for Sealing
3 4				features. This information contains confidential non-public details of Meta's product functionality and strategic considerations related to feature
5 6 7				development. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors.
8 9	59.	Exhibit J	¶ 113	This document describes future potential business
10				plans with regard to unreleased products or features. This information contains confidential
11				non-public details of Meta's product functionality and strategic considerations related to feature
12				development. This information has never been disclosed publicly and Meta's product team treats
13 14				it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors.
15	60.	Exhibit J	¶ 130	This document describes future potential business
16				plans with regard to unreleased products or features. This information contains confidential
17				non-public details of Meta's product functionality and strategic considerations related to feature
18 19				development. This information has never been disclosed publicly and Meta's product team treats
20				it as strictly confidential. If publicly revealed, this information could influence the competitive
21				decision-making and business strategies employed by Meta's competitors.
22	61.	Exhibit J	¶ 190	This document describes future potential business
23				plans with regard to unreleased products or features. This information contains confidential
24				non-public details of Meta's product functionality and strategic considerations related to feature
25				development. This information has never been disclosed publicly and Meta's product team treats
26				it as strictly confidential. If publicly revealed, this information could influence the competitive
27		1	<u> </u>	memoral coma minacino die competitivo

-23-

28 $\frac{1}{\text{No. } 3:20-\text{cv-}08570-\text{JD}}$

Case 3:20-cv-08570-JD Document 711-1 Filed 11/21/23 Page 25 of 92

Row No.	Vanderslice Decl. Ex. No.	Portion of Document Sought to Be Sealed	Basis for Sealing
			decision-making and business strategies employed by Meta's competitors.
	Reply R	eport of Sarah I	Lamdan, filed at Dkt. Nos. 645-11
62.	Exhibit K	¶ 28	This document described Meta's future potential business plans regarding privacy. This information contains non-public information regarding confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies.

DEPOSITION TRANSCRIPTS (Economides & Tucker)

N	o.	Vanderslice Decl. Ex. No.	Portion of Document Sought to Be Sealed	Basis for Sealing
Tr	ansc			nomides, filed in full at Dkt. No. 673-10 (Ex. 14), kt. Nos. 651-6 (Ex. 3) and 652-5 (Ex. 3)
63	•	Exhibit L	59:8-14	This information contains nonpublic and confidential data or research regarding internal user data, including proprietary methods for obtaining that data or conducting that research. This information has never been disclosed publicly and the Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research on U.S. users.
64		Exhibit L	93:9-20	This information contains nonpublic and confidential data or research regarding internal user data, including proprietary methods for obtaining that data or conducting that research. This information has never been disclosed publicly and the Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research on U.S. users.
65		Exhibit L	106:10-107:8	This text describes future potential business plans with regard to unreleased products or features. This information contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors.
66)•	Exhibit L	110:15-25	This text describes future potential business plans with regard to unreleased products or features.
No. 3	No. 3:20-cv-08570-JD -25- DECLARATION OF AMRISH ACHARYA ISO OMNIBUS MOTION TO SEAL MATERIALS			

1 2 3				This information contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this
4 5				information could influence the competitive decision-making and business strategies employed by Meta's competitors.
6	Two	garing of Haar Dlair	diffa? Danasidia	
7	1 ran	-	-	on of Catherine Tucker, filed in full at Dkt. No. chereof filed at Dkt. No. 673-9 (Ex. 13)
8	67.	Exhibit M	6:20-21	This text reveals the home address of Meta's expert, Catherine Tucker. Professor Tucker has a legitimate, legally recognized privacy interest in
10				protecting her contact information from public disclosure. If her contact information were to be
11				publicly disclosed, she may be subject to repeated inquiries from the press or members of the
12				general public, which could rise to the level of threats or harassment, given the current media
13				attention on Meta.
14	68.	Exhibit M	204:14-22	This information contains confidential, non-public information regarding Meta's internal
15				business strategies and analyses, including summaries and discussions of Meta's internal modeling and assessments of its advertising
16 17				platform that reveal competitively sensitive information, including how Meta's products
18				operate, and potential improvements or other
19				product changes. Disclosure of this non-public information is likely to result in competitive harm
20				to Meta, as it reveals strategic decision-making which, for example, could give an advertiser
21				unfair leverage in competing against or negotiating with Meta.
22	69.	Exhibit M	205:5-13	This information contains confidential, non-
23				public information regarding Meta's internal business strategies and analyses, including
24				summaries and discussions of Meta's internal modeling and assessments of its advertising
25				platform that reveal competitively sensitive information, including how Meta's products
26				operate, and potential improvements or other product changes. Disclosure of this non-public
27				information is likely to result in competitive harm

				to Moto ag it novogla atnotagia desigion medicina
1 2				to Meta, as it reveals strategic decision-making which, for example, could give an advertiser unfair leverage in competing against or negotiating with Meta.
3	70.	Exhibit M	206:18-	This information contains nonpublic and
4			207:12	confidential data or research regarding internal user data, including proprietary methods for
5				obtaining that data or conducting that research. This information has never been disclosed
6 7				publicly and the Meta's product team treats it as strictly confidential. If publicly revealed, this
8				information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by
9				influencing how those competitors conduct market research on U.S. users.
10	71.	Exhibit M	208:24-	This information contains nonpublic and
11			209:10	confidential data or research regarding internal user data, including proprietary methods for
12				obtaining that data or conducting that research. This information has never been disclosed
13 14				publicly and the Meta's product team treats it as strictly confidential. If publicly revealed, this
15				information could influence the competitive decision-making and business strategies
16				employed by Meta's competitors, for example by influencing how those competitors conduct
17	72.	Exhibit M	209:21-25	market research on U.S. users. This information contains nonpublic and
18	12.	Exmort W	209.21-23	confidential data or research regarding internal
19				user data, including proprietary methods for obtaining that data or conducting that research.
20				This information has never been disclosed publicly and the Meta's product team treats it as
21				strictly confidential. If publicly revealed, this information could influence the competitive
22				decision-making and business strategies
23				employed by Meta's competitors, for example by influencing how those competitors conduct
24				market research on U.S. users.
25	73.	ExhACTIVEUS 201812827v.6ibit	299:20- 301:13	This information contains nonpublic and confidential data or research regarding internal
26		M		user data, including proprietary methods for obtaining that data or conducting that research.
27				This information has never been disclosed

1	publicly and the Meta's product team treats it as
1	strictly confidential. If publicly revealed, this
2	information could influence the competitive
_	decision-making and business strategies
3	employed by Meta's competitors, for example by
	influencing how those competitors conduct
4	market research on U.S. users.
_	

OTHER FILINGS

Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
Interi		ive Motion to File Under Seal Actification and Supporting Docum	lvertiser Plaintiffs' Motion for Class nents (Dkt. No. 642)
74.	Exhibit N1	Dkt. No. 642-1, Advertisers' Motion for Class Certification, between "Ex. 8 at 331" and "with Ex. 9".	This text describes bilateral meetings with government officials as well as and senior executives from current and potential business partners of Meta. This text contains confidential, non-public information regarding discussions individuals who are not a party to this litigation, and who have a reasonable expectation that Meta will maintain the confidentiality of confidential statements made during potential partnership conversations.
75.	Exhibit N2	Dkt. No. 642-3, Exhibit 1, PX-2256 Zuckerberg Deposition (Volume 1 Exhibits)	This document describes proprietary sources and methods for gathering market research. This information contains nonpublic and confidential data or research regarding internal user data, including proprietary methods for obtaining that data or conducting that research. This information has never been disclosed publicly and the Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors

-28-

 $\frac{1}{\text{No. } 3:20-\text{cv-}08570-\text{JD}}$

$\begin{bmatrix} 1 \\ 2 \end{bmatrix}$	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3				conduct market research on U.S. users.
4 5 6 7 8 9 10 11 12 13 14 15 15 15 15 16 16 16 16	76.	Exhibit N3	Dkt. No. 642-3, Exhibit 2, PX-0414 Olivan Deposition (Volume 1 Exhibits),	This document describes proprietary sources and methods for gathering market research. This information contains nonpublic and confidential data or research regarding app performance data, including proprietary methods for obtaining that data or conducting that research. This information has never been disclosed publicly and the Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.
16 17	77.	Exhibit N3	Dkt. No. 642-3, Exhibit 2, PX-0414 Olivan Deposition (Volume 1 Exhibits), email	This text reveals email addresses or phone numbers of current or former employees of Meta. These current or
18			addresses of Meta employees	former employees have a legitimate, legally recognized privacy interest in
19				protecting their contact information from public disclosure. If their
20				contact information were to be publicly disclosed, they may be
21				subject to repeated inquiries from the press or members of the general
22				public, which could rise to the level
23				of threats or harassment, given the current media attention on Meta.
24 -	78.	Exhibit N4	Dkt. No. 642-3, Exhibit 4, PX-2862 Priell Deposition (Volume 1 Exhibits)	This document contains nonpublic and confidential data or research regarding internal user data,
26 27				including proprietary methods for obtaining that data or conducting that research. This information has

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3				never been disclosed publicly and the Meta's product team treats it as
4				strictly confidential. If publicly revealed, this information could
5				influence the competitive decision- making and business strategies employed by Meta's competitors, for
7				example by influencing how those competitors conduct market research.
8	79.	Exhibit N5	Dkt. No. 642-3, Exhibit 6, PX-	This document describes market
9	75.	Exmon 10	0020 Patel Deposition (Volume 1 Exhibits)	research data and information obtained through proprietary sources
10			1 Dimierus)	and methods. This text reflects user
11				data calculated or derived from Meta's internal market research
12				which is non-public information, and if revealed to competitors and
14				potential business counterparties, could be used to disadvantage Meta.
15				For example, if competitor platforms became aware of this information,
16				they could use it to inform their own strategies, improperly leveraging
17				Meta's data in an effort to compete unfairly against Meta.
18	80.	Exhibit N6	Dkt. No. 642-3, Exhibit 8, PX-0557 Schultz Deposition	This text describes bilateral meetings with government officials as well as
19			(Volume 1 Exhibits), at PALM-01460331-332, under heading	senior executives from current and potential business partners of Meta.
20 21			'Davos Meetings'	This text contains confidential, non-
22				public information regarding a non- party and implicates the nonparty's
23				confidentiality interests, by revealing the identity of an individual who is
24				not a party to this litigation, and who has a reasonable expectation that
25				Meta will maintain the confidentiality of statements during
26				potential partnership conversations.
27	81.	Exhibit N6	Dkt. No. 642-3, Exhibit 8, PX-0557 Schultz Deposition	This text describes bilateral meetings with government officials as well as

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3			(Volume 1 Exhibits), Pages PALM-01460333-338 (after	senior executives from current and potential business partners of Meta.
4			"MEETINGS")	This text contains confidential, non-public information regarding a non-
5				party and implicates the nonparty's confidentiality interests, by revealing the identity of an individual who is
7				not a party to this litigation, and who has a reasonable expectation that
8				Meta will maintain the confidentiality of statements during
9				potential partnership conversations.
10	82.	Exhibit N6	Dkt. No. 642-3, Exhibit 8, PX-0557 Schultz Deposition	This text reveals email addresses or phone numbers of current or former
11			(Volume 1 Exhibits), email addresses of Meta employees	employees of Meta. These current or former employees have a legitimate,
12			addresses of Meta employees	legally recognized privacy interest in protecting their contact information
13 14				from public disclosure. If their contact information were to be
15				publicly disclosed, they may be subject to repeated inquiries from the
16				press or members of the general public, which could rise to the level
17				of threats or harassment, given the current media attention on Meta.
18	83.	Exhibit N7	Dkt. No. 642-3, Exhibit 14, PX-1317 Chang Deposition	This document contains confidential, non-public information regarding
19 20			(Volume 1 Exhibits)	Meta's internal business strategies and analyses, including summaries
21				and discussions of Meta's internal modeling and assessments of its
22				products that reveal competitively sensitive information, including how
23				users or developers use and value
24				Meta's products, services, how they operate, and potential improvements
25				or other product changes. Disclosure of this non-public information is
26				likely to result in competitive harm to Meta, as it reveals strategic
27				decision-making which, for example,
[could give a developer or business

28

Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
			partner unfair leverage in competing against or negotiating with Meta.
84.	Exhibit N8	Dkt. No. 642-3, Exhibit 16, PX-1322 Chang Deposition (Volume 1 Exhibits)	This document describes the negotiation of specific contract terms between Meta and Ticketmaster. This text contains confidential, non-public information regarding a non-party developer and implicates their confidentiality interests, by revealing the identity of a Meta developer who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer.
85.	Exhibit N9	Dkt. No. 642-3, Exhibit 19 (Volume 1 Exhibits), Pages - 856-858 (between "Section 2" and "Section 3")	This text describes specific contract terms between Meta and app developers. This text contains confidential, non-public information regarding a non-party developer. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3	86.	Exhibit N9	Dkt. No. 642-3, Exhibit 19 (Volume 1 Exhibits), page PALM-012438858, "Section 3: Integration Partnerships"	This text describes specific contract terms between Meta and app developers. This text contains confidential, non-public information regarding a non-party developer. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developers.
3	87.	Exhibit N9	Dkt. No. 642-3, Exhibit 19 (Volume 1 Exhibits), page	This text describes specific contract terms between Meta and app
			PALM-012438861, from "Integration Partnerships—	developers. This text contains confidential, non-public information
;			Messenger" to "Integration Partnerships—WhatApp"	regarding a non-party developer. Disclosure of this non-public
				information is likely to result in competitive harm to Meta, as it
				reveals strategic decision-making, which, for example, could give a
				competitor or potential business partner unfair leverage in competing
				against or negotiating with Meta. Moreover, Meta's competitors could
				use this non-party information to unfairly target Meta's developers.
	88.	Exhibit N9	Dkt. No. 642-3, Exhibit 19 (Volume 1 Exhibits), page	This text reveals the identity of specific app developers who have
,			PALM-012438865-66, list	entered contracts with Meta. This
l			under "messaging functionality of Facebook:".	text contains confidential, non-public information regarding a non-party
				developer and implicates their confidentiality interests, by revealing
				the identity of a Meta developer who is not party to this litigation, and
				who has a reasonable expectation
	No. 3:20-	ev-08570-JD	-33- D	that Meta will maintain the ECLARATION OF AMRISH ACHARYA ISO

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3 4				confidentiality of contractual terms and its own confidential statements made during negotiations. Moreover,
5				Meta's competitors could use this non-party information to unfairly target Meta's developers.
6	89.	Exhibit N10	Dkt. No. 642-3, Exhibit 20	This document is a confidential
7			(Volume 1 Exhibits)	agreement between Meta and an app developer. This text contains
8				confidential, non-public information
9				regarding a non-party developer, and implicates their confidentiality
10				interests, by revealing the identity of a Meta developer who is not party to
11				this litigation, and who has a
12				reasonable expectation that Meta will maintain the confidentiality of
13				contractual terms and its own confidential statements made during
14				negotiations. Further, disclosure of
15				this non-public information is likely to result in competitive harm to
16				Meta, as it reveals strategic decision- making, which, for example, could
17				give a competitor or potential
18				business partner unfair leverage in competing against or negotiating
19				with Meta. Moreover, Meta's competitors could use this non-party
20				information to unfairly target Meta's developer.
21	90.	Exhibit N11	Dkt. No. 642-4, Exhibit 21	This document is a confidential
22			(Volume 2 Exhibits)	agreement between Meta and an app developer. This text contains
23				confidential, non-public information regarding a non-party developer, and
24				implicates their confidentiality
25				interests, by revealing the identity of a Meta developer who is not party to
26				this litigation, and who has a
27				reasonable expectation that Meta will maintain the confidentiality of
28				contractual terms and its own

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3 4 5 6 7 8 9				confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer.
$0 \parallel$	91.	Exhibit N12	Dkt. No. 642-4, Exhibit 23	This text reveals confidential
$\begin{bmatrix} 1 \\ 2 \end{bmatrix}$			(Volume 2 Exhibits), Page -190 (figure in fifth row, second	information regarding Netflix's ad spend on Meta. This text contains
3			column from right)	confidential, non-public information regarding an advertiser and
4				implicates their confidentiality interests, by revealing the
5				confidential business information of a Meta advertiser who is not party to
6				this litigation, and who has a reasonable expectation that Meta
7				will maintain the confidentiality of contractual terms and its own
8				confidential statements made during negotiations. Further, disclosure of
9				this non-public information is likely to result in competitive harm to
0				Meta, as it reveals strategic decision-
1				making, which, for example, could give a competitor or potential
2				business partner unfair leverage in competing against or negotiating
3				with Meta. Moreover, Meta's competitors could use this non-party
4 5				information to unfairly target Meta's advertiser.
6 7	92.	Exhibit N12	Dkt. No. 642-4, Exhibit 23 (Volume 2 Exhibits), pages PALM-011831167-68, Section	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed,

28

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3			6 "Re-Authorization of Equity Subcommittee Delegation"	it could cause Meta competitive harm by giving competitors insight into confidential Meta financial
4				information.
5	93.	Exhibit N12	Dkt. No. 642-4, Exhibit 23 (Volume 2 Exhibits), pages	This information reflects and is calculated from internal, non-public
7			PALM-011831168-69, Section 7 "Equity Pool Evergreen	Meta financial data. Were this information to be publicly revealed,
8			Increase"	it could cause Meta competitive harm by giving competitors insight into confidential Meta financial
9				information.
10	94.	Exhibit N12	Dkt. No. 642-4, Exhibit 23	This information reflects and is
11			(Volume 2 Exhibits), page PALM-011831171	calculated from internal, non-public Meta financial data. Were this
12				information to be publicly revealed, it could cause Meta competitive
13				harm by giving competitors insight into confidential Meta financial
14				information
15	95.	Exhibit N13	Dkt. No. 642-4, Exhibit 25 (Volume 2 Exhibits), Page -654	This document describes the negotiation of specific contract terms
16			(between "1." and "My	between Meta and Netflix. This text
17 18			recommendation")	contains non-public and confidential information regarding Meta's agreements with a business partner
19				as well as internal strategy relating to those agreements. Disclosure of this
20				non-public information is likely to result in competitive harm to Meta,
21				as it reveals strategic decision- making which, for example, could
22				give an ad venue or business partner
23				unfair leverage in competing against or negotiating with Meta. Moreover,
24				Meta's competitors could use this non-party information to unfairly
25				target Meta's business partners and offer specific deal terms designed to
26				undercut those offered by Meta.

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3	96.	Exhibit N13	Dkt. No. 642-4, Exhibit 25 (Volume 2 Exhibits), Page -655	This document describes the negotiation of specific contract terms
4			(email from Andrew Bosworth)	between Meta and Netflix. This text contains non-public and confidential
5				information regarding Meta's agreements with a business partner
7				as well as internal strategy relating to those agreements. Disclosure of this
8				non-public information is likely to result in competitive harm to Meta,
9				as it reveals strategic decision- making which, for example, could
10				give an ad venue or business partner unfair leverage in competing against
11				or negotiating with Meta. Moreover, Meta's competitors could use this
12				non-party information to unfairly target Meta's business partners and
13				offer specific deal terms designed to undercut those offered by Meta. This
14				text also contains confidential,
15				proprietary, and commercially sensitive information regarding the
16				technical functionalities and processes of Meta's ad targeting and
17				delivery systems. If publicly revealed, this information could
18				influence the competitive decision- making and business strategies
19 20				employed by Meta's competitors in advertising.
21	97.	Exhibit N13	Dkt. No. 642-4, Exhibit 25	This text reveals email addresses or
22			(Volume 2 Exhibits), email address of Meta employees	phone numbers of current or former employees of Meta. These current or
23				former employees have a legitimate, legally recognized privacy interest in
24				protecting their contact information
25				from public disclosure. If their contact information were to be
26				publicly disclosed, they may be subject to repeated inquiries from the
27				press or members of the general public, which could rise to the level
	<u> </u>	1	ı	, , , , , , , , , , , , , , , , , , , ,

28 $\frac{1}{\text{No. } 3:20\text{-cv-}08570\text{-JD}}$

28

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3				terms designed to undercut those offered by Meta.
4 5 6 7 8 9 10 11 12 13 14 15	100.	Exhibit N16	Dkt. No. 642-4, Exhibit 38, PX-1926 Sandberg Deposition (Volume 2 Exhibits)	This document describes proprietary market research and analysis on a Meta competitor. This text contains non-public and confidential information regarding Meta's agreements with an advertiser as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an advertiser unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's advertisers and offer specific deal terms designed to undercut those offered by Meta.
16	101.	Exhibit N17	Dkt. No. 642-4, Exhibit 39, PX-0610 Hastings Deposition	This text describes confidential pricing information. This
17			(Volume 2 Exhibits), Page -295 (between "guess that" and	information reveals Meta's internal non-public pricing information for
18			"CPMs is a reasonable estimate")	advertising on Meta's products or services, including how those prices
19 20			- Community	can be determined. This information is not otherwise publicly reported by
$\begin{bmatrix} 20 \\ 21 \end{bmatrix}$				the company and disclosure is likely to cause Meta competitive harm and
22				give its competitors an unfair
23				advantage. Meta's competitors could improperly utilize this internal, non-
24				public information to modify or augment their business operations in
25				an effort to compete unfairly against Meta.
26 27	102.	Exhibit N17	Dkt. No. 642-4, Exhibit 39, PX-0610 Hastings Deposition	This text reveals email addresses or phone numbers of current or former employees of Meta. These current or

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3			(Volume 2 Exhibits), email addresses of Meta employees	former employees have a legitimate, legally recognized privacy interest in protecting their contact information
5				from public disclosure. If their contact information were to be
6				publicly disclosed, they may be subject to repeated inquiries from the press or members of the general
7 8				public, which could rise to the level of threats or harassment, given the
9	102	E 171 '4 NI10	D1. N. (42.5 F.1.11.42	current media attention on Meta.
10	103.	Exhibit N18	Dkt. No. 642-5, Exhibit 42 (Volume 3 Exhibits)	This document describes the negotiation of specific contract terms
11				between Meta and Google. This text contains non-public and confidential
12				information regarding Meta's agreements with a business partner
13				as well as internal strategy relating to
14				those agreements. Disclosure of this non-public information is likely to
15				result in competitive harm to Meta, as it reveals strategic decision-
16				making which, for example, could
17				give an ad venue or business partner unfair leverage in competing against
				or negotiating with Meta. Moreover, Meta's competitors could use this
18				non-party information to unfairly
19 20				target Meta's business partners and offer specific deal terms designed to
21	104	E-1.:1.:4 N110	Dl.4 No. 640 5 Evil. il. 442	undercut those offered by Meta. This document describes the
	104.	Exhibit N19	Dkt. No. 642-5, Exhibit 43 (Volume 3 Exhibits)	negotiation of specific contract terms
22				between Meta and Google. This text contains non-public and confidential
23				information regarding Meta's
24				agreements with a business partner as well as internal strategy relating to
25				those agreements. Disclosure of this
26				non-public information is likely to result in competitive harm to Meta,
27				as it reveals strategic decision- making which, for example, could
	L			maxing which, for example, could

28 $\frac{1}{\text{No. } 3:20\text{-cv-}08570\text{-JD}}$

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3 4 5				give an ad venue or business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly
6 7				target Meta's business partners and offer specific deal terms designed to undercut those offered by Meta.
8	105.	Exhibit N20	Dkt. No. 642-5, Exhibit 44, PX-	This document describes the
9			1704 Crum Deposition (Volume 3 Exhibits)	negotiation of specific contract terms between Meta and Google. This text
10				contains non-public and confidential information regarding Meta's
11				agreements with a business partner as well as internal strategy relating to
12				those agreements. Disclosure of this non-public information is likely to
13				result in competitive harm to Meta, as it reveals strategic decision-
14				making which, for example, could give an ad venue or business partner
15				unfair leverage in competing against
16				or negotiating with Meta. Moreover, Meta's competitors could use this
17				non-party information to unfairly target Meta's business partners and
18				offer specific deal terms designed to undercut those offered by Meta.
19	106.	Exhibit N21	Dkt. No. 642-5, Exhibit 47, PX-	This document describes future
20			1709 Crum Deposition (Volume 3 Exhibits)	potential business plans and strategy with respect to header bidding. This
21				information contains non-public information regarding Meta's
22				confidential non-public internal
23				strategic considerations related to Meta's advertising product and
24				feature development. This
25				information has never been disclosed publicly. Disclosure of this
26				information would adversely impact Meta's current competitive position
27				by enabling Meta's competitors to mimic its confidential strategies.
28	No. 3:20-	ev-08570-JD	-41- D	ECLARATION OF AMRISH ACHARYA ISO

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3	107.	Exhibit N22	Dkt. No. 642-5, Exhibit 48, excerpts from Deposition of	This document describes technical aspects of Meta's advertising
4			Stephanie Wang, dated March	products and future potential
5			28, 2023 (Volume 3 Exhibits)	business plans regarding relationship with Google. This information contains confidential, proprietary,
6 7				and commercially sensitive information regarding the technical
3				functionalities and processes of Meta's ad targeting and delivery
$\ $				systems. This information has never been disclosed publicly and Meta's
)				product team treats it as strictly confidential. If publicly revealed,
				this information could influence the competitive decision-making and
2				business strategies employed by Meta's competitors in advertising.
³ 	108.	Exhibit N23	Dkt. No. 642-5, Exhibit 49,	This document describes technical
.			excerpts from Deposition of Henry Crum, dated May 25,	aspects of Meta's advertising products and future potential
5			2023 (Volume 3 Exhibits)	business plans regarding relationship
,				with Google. This information contains confidential, proprietary,
				and commercially sensitive information regarding the technical
				functionalities and processes of Meta's ad targeting and delivery
				systems. This information has never been disclosed publicly and Meta's
				product team treats it as strictly confidential. If publicly revealed,
				this information could influence the
				competitive decision-making and business strategies employed by
				Meta's competitors in advertising.
	109.	Exhibit N24	Dkt. No. 642-5, Exhibit 50, PX-	This document describes the
			1295 Jakubowski Deposition (Volume 3 Exhibits)	negotiation of specific contract terms between Meta and Google. This text
				contains non-public and confidential information regarding Meta's
				agreements with a business partner
		cv-08570-ID	_42_ D	as well as internal strategy relating to

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3				those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta,
5				as it reveals strategic decision- making which, for example, could
6				give an ad venue or business partner unfair leverage in competing against
7				or negotiating with Meta. Moreover, Meta's competitors could use this
8				non-party information to unfairly target Meta's business partners and
9				offer specific deal terms designed to undercut those offered by Meta.
10 11	110.	Exhibit N25	Dkt. No. 642-5, Exhibit 52, PX-1708 Crum Deposition	This document describes the
12			(Volume 3 Exhibits)	negotiation of specific contract terms between Meta and Google. This text
13				contains non-public and confidential information regarding Meta's
14				agreements with a business partner as well as internal strategy relating to
15				those agreements. Disclosure of this non-public information is likely to
16				result in competitive harm to Meta, as it reveals strategic decision-
17				making which, for example, could give an ad venue or business partner
18				unfair leverage in competing against or negotiating with Meta. Moreover,
19 20				Meta's competitors could use this non-party information to unfairly
21				target Meta's business partners and offer specific deal terms designed to
22	111.	Exhibit N26	Dkt. No. 642-5, Exhibit 54, PX-	undercut those offered by Meta. This document describes the
23			1712 Crum Deposition (Volume 3 Exhibits)	negotiation of specific contract terms between Meta and Google. This text
24			(. Statile 5 Daillotts)	contains non-public and confidential information regarding Meta's
25				agreements with a business partner as well as internal strategy relating to
26				those agreements. Disclosure of this
27				non-public information is likely to result in competitive harm to Meta,
28	No. 3:20-	-cv-08570-JD	-43- D	ECLARATION OF AMRISH ACHARYA ISO

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3				as it reveals strategic decision- making which, for example, could
4				give an ad venue or business partner unfair leverage in competing against
5				or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly
7				target Meta's business partners and offer specific deal terms designed to
8				undercut those offered by Meta.
9	112.	Exhibit N27	Dkt. No. 642-5, Exhibit 56, PX-1922 Sandberg Deposition	This document contains pricing and financial information relating to
10			(Volume 3 Exhibits)	Audience Network. This information reveals Meta's internal non-public
11				profit, revenue, and financial calculations. These data sets are not
12				otherwise publicly reported by the
13				company and their disclosure is likely to cause Meta competitive
14				harm and give its competitors an unfair advantage. Meta's competitors
15				could improperly utilize this internal,
16				non-public data to modify or augment their business operations in
17				an effort to compete unfairly against Meta. Moreover, visibility into the
18				trends in the data (i.e., figures across multiple years) gives Meta's
19 20				competitors improper insight into the financial health and future outlook of
21				Meta's product development and advertising business, which also
22				arguably gives Meta's competitors an unfair advantage.
23	113.	Exhibit N28	Dkt. No. 642-5, Exhibit 57, PX-	This document describes the
24			1921 Sandberg Deposition (Volume 3 Exhibits)	negotiation of specific contract terms between Meta and Google. This text
25				contains non-public and confidential information regarding Meta's
26				agreements with a business partner as well as internal strategy relating to
27				those agreements. Disclosure of this non-public information is likely to
20				non-public information is likely to

28 $\frac{1}{\text{No. } 3:20-\text{cv}-08570-\text{JD}}$

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3 4				result in competitive harm to Meta, as it reveals strategic decision- making which, for example, could give an ad venue or business partner
5 6				unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly
7 8				target Meta's business partners and offer specific deal terms designed to undercut those offered by Meta.
9	114.	Exhibit N29	Dkt. No. 642-5, Exhibit 60, PX-1713 Crum Deposition	This document describes the negotiation of specific contract terms
10			(Volume 3 Exhibits)	between Meta and Google. This text contains non-public and confidential
12				information regarding Meta's agreements with a business partner
13				as well as internal strategy relating to those agreements. Disclosure of this
14				non-public information is likely to
15				result in competitive harm to Meta, as it reveals strategic decision-
16				making which, for example, could give an ad venue or business partner
17				unfair leverage in competing against or negotiating with Meta. Moreover,
18 19				Meta's competitors could use this non-party information to unfairly
20				target Meta's business partners and offer specific deal terms designed to undercut those offered by Meta.
21	115.	Exhibit N30	Dkt. No. 642-6, Exhibit 61, PX-	This document describes the
22			0463 Wang Deposition (Volume 4 Exhibits)	negotiation of specific contract terms between Meta and Google. This text
23				contains non-public and confidential information regarding Meta's
24				agreements with a business partner as well as internal strategy relating to
25				those agreements. Disclosure of this non-public information is likely to
26				result in competitive harm to Meta, as it reveals strategic decision-
27 28		-cv-08570-JD	-45- D	making which, for example, could

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3				give an ad venue or business partner unfair leverage in competing against
4				or negotiating with Meta. Moreover, Meta's competitors could use this
5				non-party information to unfairly target Meta's business partners and offer specific deal terms designed to
7				undercut those offered by Meta.
8	116.	Exhibit N31	Dkt. No. 642-6, Exhibit 62, PX-0185 Rose Deposition (Volume	This document describes the negotiation of specific contract terms
9			4 Exhibits)	between Meta and Google. This text contains non-public and confidential
10				information regarding Meta's agreements with a business partner
11				as well as internal strategy relating to
12				those agreements. Disclosure of this non-public information is likely to
13				result in competitive harm to Meta, as it reveals strategic decision-
14				making which, for example, could give an ad platform or business
15				partner unfair leverage in competing
16				against or negotiating with Meta. Moreover, Meta's competitors could
17				use this non-party information to unfairly target Meta's business
18 19				partners and offer specific deal terms designed to undercut those offered
20	117.	Exhibit N32	Dkt. No. 642-6, Exhibit 63,	by Meta. This document describes technical
21		Emmon 132	excerpts of Deposition of John	aspects of Meta's advertising
22			David Jakubowski, dated April 21, 2023 (Volume 4 Exhibits)	products and future potential business plans regarding relationship
23				with Google. This information contains confidential, proprietary,
24				and commercially sensitive information regarding the technical
25				functionalities and processes of
26				Meta's ad targeting and delivery systems. This information has never
27				been disclosed publicly and Meta's product team treats it as strictly
21				confidential. If publicly revealed,

28 $\frac{1}{\text{No. } 3:20-\text{cv}-08570-\text{JD}}$

Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
			this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
118.	Exhibit N33	Dkt. No. 642-6, Exhibit 64, PX-0464 Wang Deposition (Volume 4 Exhibits)	This document describes the negotiation of specific contract terms between Meta and Google. This text contains non-public and confidential information regarding Meta's
			agreements with a business partner as well as internal strategy relating to
			those agreements. Disclosure of this non-public information is likely to
			result in competitive harm to Meta, as it reveals strategic decision-
			making which, for example, could give an ad platform business partner
			unfair leverage in competing against or negotiating with Meta. Moreover,
			Meta's competitors could use this non-party information to unfairly
			target Meta's business partners and offer specific deal terms designed to
119.	Exhibit N34	Dkt. No. 642-6, Exhibit 67	undercut those offered by Meta. This document describes potential
119.	Exmolt N34	(Volume 4 Exhibits)	changes in product functionality.
			This information contains confidential, proprietary, and
			commercially sensitive information regarding the technical
			functionalities and processes of Meta's ad targeting and delivery
			systems. This information has never been disclosed publicly and Meta's
			product team treats it as strictly confidential. If publicly revealed,
			this information could influence the competitive decision-making and
			business strategies employed by Meta's competitors in advertising.
120.	Exhibit N35	Dkt. No. 642-6, Exhibit 68 (Volume 4 Exhibits)	This document describes technical aspects of Meta's infrastructure. This

28 $\frac{1}{\text{No. } 3:20\text{-cv-}08570\text{-JD}}$

DECLARATION OF AMRISH ACHARYA ISO OMNIBUS MOTION TO SEAL MATERIALS SUBMITTED IN CONNECTION WITH CLASS CERTIFICATION AND *DAUBERT* BRIEFING

-47-

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3				information contains confidential, proprietary, and commercially sensitive information regarding the
5				technical functionalities and processes of Meta's ad targeting and
6				content delivery systems. This information has never been disclosed
7				publicly and Meta's product team treats it as strictly confidential. If
8				publicly revealed, this information could influence the competitive
9				decision-making and business strategies employed by Meta's
10				competitors in advertising.
11	121.	Exhibit N36	Dkt. No. 642-6, Exhibit 69, PX-0119 Parikh Deposition	This document describes technical aspects of Meta's infrastructure. This
12			(Volume 4 Exhibits)	information contains confidential, proprietary, and commercially
13 14				sensitive information regarding the technical functionalities and
15				processes of Meta's ad targeting and content delivery systems. This
16				information has never been disclosed publicly and Meta's product team
17				treats it as strictly confidential. If publicly revealed, this information
18				could influence the competitive decision-making and business
19				strategies employed by Meta's competitors in advertising.
20 21	122.	Exhibit N37	Dkt. No. 642-6, Exhibit 70,	This document describes technical
22			excerpts from Deposition of Jay Parikh, dated March 9, 2023	aspects of Meta's infrastructure. This information contains confidential,
23			(Volume 4 Exhibits)	proprietary, and commercially sensitive information regarding the
24				technical functionalities and processes of Meta's ad targeting and
25				content delivery systems. This information has never been disclosed
26				publicly and Meta's product team treats it as strictly confidential. If
27				publicly revealed, this information could influence the competitive

28

Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
			decision-making and business strategies employed by Meta's competitors in advertising.
123.	Exhibit N38	Dkt. No. 642-6, Exhibit 72, excerpts from Deposition of Rob Goldman, dated June 13, 2023 (Volume 4 Exhibits), 26:19-22	This text describes technical aspects of Meta's advertising products. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
124.	Exhibit N39	Dkt. No. 642-6, Exhibit 74, excerpts from Deposition of Jonathan Eide, dated May 9, 2023 (Volume 4 Exhibits)	This document describes Meta's proprietary ad measurement methodology. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction delivery systems. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
			nsumer Plaintiffs' Notice of Motion nt of Class Counsel (Dkt. No. 645)
125.	Exhibit O1	Dkt. No. 645-1, Consumer Plaintiffs' Notice of Motion and Motion for Class Certification and Appointment of Class Counsel, 6:3 (quoting Ex. 39)	This text describes Meta's internal analyses and business strategy regarding data privacy policies and practices. This information contains confidential non-public details of
No. 3:20-	ev-08570-JD	-49- D	Meta's product functionality and ECLARATION OF AMRISH ACHARYA ISO

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3 4				strategic considerations related to feature development. This information has never been disclosed publicly and Meta's product team
5 6				treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business
7 8				strategies employed by Meta's competitors.
9	126.	Exhibit O1	Dkt. No. 645-1, Consumer Plaintiffs' Notice of Motion and	This text describes Meta's internal analyses and business strategy regarding data privacy policies and
0			Motion for Class Certification and Appointment of Class	practices. This information
1			Counsel, 6:7-10	confidential non-public details of Meta's product functionality and
2				strategic considerations related to feature development. This
3				information has never been disclosed publicly and Meta's product team
4				treats it as strictly confidential. If
5				publicly revealed, this information could influence the competitive
6 7				decision-making and business strategies employed by Meta's competitors.
8	127.	Exhibit O1	Dkt. No. 645-1, Consumer	This text describes Meta's internal analyses and business strategy
9			Plaintiffs' Notice of Motion and Motion for Class Certification	regarding data privacy policies and
0			and Appointment of Class Counsel, 8:19-21	practices. This information contains confidential non-public details of
1			Counsel, 6119 21	Meta's product functionality and strategic considerations related to
2				feature development . This
.3				information has never been disclosed publicly and Meta's product team
4				treats it as strictly confidential. If publicly revealed, this information
5				could influence the competitive
6				decision-making and business strategies employed by Meta's competitors.
7		1	1	1

 $28 \parallel_{\overline{N}_0}$

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3	128.	Exhibit O1	Dkt. No. 645-1, Consumer	This text describes Meta's internal analyses and business strategy
4			Plaintiffs' Notice of Motion and Motion for Class Certification	regarding data privacy policies and
5			and Appointment of Class	practices. This information contains confidential non-public details of
			Counsel, 11:16-17	Meta's product functionality and
6				strategic considerations related to feature development. This
7				information has never been disclosed
8				publicly and Meta's product team treats it as strictly confidential. If
9				publicly revealed, this information
10				could influence the competitive decision-making and business
11				strategies employed by Meta's
12	129.	Exhibit O1	Dkt. No. 645-1, Consumer	competitors. This text describes Meta's internal
	12).	Exmon O1	Plaintiffs' Notice of Motion and	analyses and business strategy
13			Motion for Class Certification	regarding data privacy policies and practices. This information contains
14			and Appointment of Class Counsel, 11:21-12:6, 10-12	confidential non-public details of
15			Counsel, 11.21 12.0, 10 12	Meta's product functionality and
				strategic considerations related to
16				feature development . This information has never been disclosed
17				publicly and Meta's product team
				treats it as strictly confidential. If
18				publicly revealed, this information
19				could influence the competitive
20				decision-making and business strategies employed by Meta's
20				competitors.
21	130.	Exhibit O1	Dkt. No. 645-1, Consumer	This text describes Meta's internal
22			Plaintiffs' Notice of Motion and	analyses and business strategy
23			Motion for Class Certification and Appointment of Class	regarding data privacy policies and practices. This information contains
23			Counsel, 13:4-9	confidential non-public details of
24			, -	Meta's product functionality and
25				strategic considerations related to feature development. This
				information has never been disclosed
26				publicly and Meta's product team
27				treats it as strictly confidential. If publicly revealed, this information
28	No. 3:20-	ev-08570-JD	-51- Di	ECLARATION OF AMRISH ACHARYA ISO

Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
			could influence the competitive decision-making and business strategies employed by Meta's competitors.
131.	Exhibit O1	Dkt. No. 645-1, Consumer Plaintiffs' Notice of Motion and Motion for Class Certification	This text describes Meta's internal analyses and business strategy regarding data privacy policies and
		and Appointment of Class Counsel, 14:4-5	practices. This information contains confidential non-public details of
			Meta's product functionality and strategic considerations related to feature development. This
			information has never been disclosed publicly and Meta's product team
			treats it as strictly confidential. If publicly revealed, this information
			could influence the competitive decision-making and business
			strategies employed by Meta's competitors.
132.	Exhibit O1	Dkt. No. 645-1, Consumer Plaintiffs' Notice of Motion and	This text describes Meta's internal analyses and business strategy
		Motion for Class Certification and Appointment of Class	regarding data privacy policies and practices. This information
		Counsel, 21:20-26	confidential non-public details of Meta's product functionality and
			strategic considerations related to feature development . This
			information has never been disclosed publicly and Meta's product team
			treats it as strictly confidential. If publicly revealed, this information
			could influence the competitive decision-making and business
			strategies employed by Meta's competitors.
133.	Exhibit O1	Dkt. No. 645-1, Consumer Plaintiffs' Notice of Motion and	This text describes Meta's internal analyses and business strategy
		Motion for Class Certification and Appointment of Class	regarding data privacy policies and practices. This information contains
		Counsel, 22:19-20	confidential non-public details of Meta's product functionality and
			strategic considerations related to feature development. This
No. 3:20	-cv-08570-JD	-52- D	ECLARATION OF AMRISH ACHARYA ISO

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3 4 5 6 7				information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors.
8 9 10 11 12 13 14	134.	Exhibit O2	Dkt. No. 645-13, Exhibit 17, Summary Chart of Illustrative Examples of Facebook's Deceptive Statements and Omissions, p. 8, between "Facebook "cookie[s]" and "off it."; p. 9, "between "Facebook "cookie[s]" and "off it"	This text contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies.
15 16 17 18 19 20 21	135.	Exhibit O2	Dkt. No. 645-13, Exhibit 17, Summary Chart of Illustrative Examples of Facebook's Deceptive Statements and Omissions, p. 12, between "Moreover, Facebook's assurance" and "backlash"	This text contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies.
222324252627	136.	Exhibit O2	Dkt. No. 645-13, Exhibit 17, Summary Chart of Illustrative Examples of Facebook's Deceptive Statements and Omissions, pp. 13-14, between "For example, a presentation" and "multiple exceptions"	This text contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling

28 $\frac{1}{\text{No. } 3:20\text{-cv-}08570\text{-JD}}$

Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
			Meta's competitors to mimic its confidential strategies.
137.	Exhibit O2	Dkt. No. 645-13, Exhibit 17, Summary Chart of Illustrative Examples of Facebook's Deceptive Statements and Omissions, pp. 15-16, between "For example, a presentation" and "multiple exceptions"	This text contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies.
138.	Exhibit O2	Dkt. No. 645-13, Exhibit 17, Summary Chart of Illustrative Examples of Facebook's Deceptive Statements and Omissions, pp. 19, between "For example, a presentation" and "multiple exceptions"	This text contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies.
139.	Exhibit O2	Dkt. No. 645-13, Exhibit 17, Summary Chart of Illustrative Examples of Facebook's Deceptive Statements and Omissions, pp. 20-21, between "For example, a presentation" and "multiple exceptions"	This text contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies.
140.	Exhibit O2	Dkt. No. 645-13, Exhibit 17, Summary Chart of Illustrative	This text contains confidential non-public details of Meta's product

28

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3			Examples of Facebook's Deceptive Statements and	functionality and strategic considerations related to feature
4			Omissions, p. 23 between "But, Facebook's" and "use it[.]"	development. This information has never been disclosed publicly.
5				Disclosure of this information would adversely impact Meta's current competitive position by enabling
7				Meta's competitors to mimic its confidential strategies.
8				
9	141.	Exhibit O3	Dkt. No. 645-13, Exhibit 25, messages sent at 20:49-20:50	This text describes the technical function of Meta's Download Your
10				Information product and features. This information contains non-public
11				information regarding Meta's confidential non-public internal
12				strategic considerations related to
13				creating value for and attracting users to Meta's products or services.
14 15				This information has never been disclosed publicly. Disclosure of this
16				information would adversely impact Meta's current competitive position
17				by enabling Meta's competitors to mimic its confidential strategies in
18				an effort to attract users away from Meta.
19	142.	Exhibit O3	Dkt. No. 645-13, Exhibit 25, message sent at 20:54:06	This text describes the technical function of Meta's Download Your
20			message sent at 20.34.00	Information product and features.
21				This information contains non-public information regarding Meta's
22				confidential non-public internal strategic considerations related to
23				creating value for and attracting users to Meta's products or services.
24				This information has never been
25				disclosed publicly. Disclosure of this information would adversely impact
26				Meta's current competitive position by enabling Meta's competitors to
27				mimic its confidential strategies in

1 Roy No	l Decl Ev	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3			an effort to attract users away from Meta.
4 143 5 6 7 8 9 0 1 2 3	3. Exhibit O3	Dkt. No. 645-13, Exhibit 25, messages sent at 20:56:06-20:56:16	This text describes the technical function of Meta's Download Your Information product and features. This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users away from Meta.
4 144 5 144	Exhibit O3	Dkt. No. 645-13, Exhibit 25, message sent at 20:55:25	This text describes the technical function of Meta's Download Your Information product and features.
6			This information contains non-public information regarding Meta's
7			confidential non-public internal strategic considerations related to
8			creating value for and attracting users to Meta's products or services.
9			This information has never been disclosed publicly. Disclosure of this
			information would adversely impact Meta's current competitive position
$_{2}$			by enabling Meta's competitors to mimic its confidential strategies in
3			an effort to attract users away from Meta.
4 145	5. Exhibit O3	Dkt. No. 645-13, Exhibit 25,	This text describes the technical
5		messages sent at 20:57:41- 20:58:36	function of Meta's Download Your Information product and features.
5			This information contains non-public information regarding Meta's
′ <u> </u>			confidential non-public internal

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3				strategic considerations related to creating value for and attracting
5				users to Meta's products or services. This information has never been disclosed publicly. Disclosure of this
6				disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position
7				by enabling Meta's competitors to mimic its confidential strategies in
8				an effort to attract users away from Meta.
9	146.	Exhibit O3	Dkt. No. 645-13, Exhibit 25,	This text reveals information about
10			Exhibit 25, message sent at 21:01:26	Meta's internal risk assessments and strategies for addressing that risk.
11				This information contains confidential, non-public information
12				regarding Meta's internal business
13				strategies and analyses, including summaries and discussions of Meta's
14				internal modeling and assessments of its products, services, or advertising
15				platform that reveal competitively
16				sensitive information, including how users or advertisers use and value
17				Meta's products, services, or advertising platform, how they
18				operate, and potential improvements or other product changes. Disclosure
19				of this non-public information is
20				likely to result in competitive harm to Meta, as it reveals strategic
21				decision-making which, for example, could give a developer, advertiser, or
22				business partner unfair leverage in
23				competing against or negotiating with Meta.
24	147.	Exhibit O3	Dkt. No. 645-13, Exhibit 25, Exhibit 25, message sent at	This text reveals information about Meta's internal risk assessments and
25			21:01:32	strategies for addressing that risk.
26				This information contains confidential, non-public information
27				regarding Meta's internal business strategies and analyses, including
• •				strategies and analyses, including

28

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3				summaries and discussions of Meta's
4				internal modeling and assessments of its products, services, or advertising
				platform that reveal competitively
5				sensitive information, including how users or advertisers use and value
6				Meta's products, services, or
7				advertising platform, how they operate, and potential improvements
8				or other product changes. Disclosure
9				of this non-public information is likely to result in competitive harm
10				to Meta, as it reveals strategic
11				decision-making which, for example, could give a developer, advertiser, or
				business partner unfair leverage in
12				competing against or negotiating with Meta.
13	148.	Exhibit O3	Dkt. No. 645-13, Exhibit 25,	This text reveals information about
14			Exhibit 25, message sent at 21:02:30	Meta's internal risk assessments and strategies for addressing that risk.
15			21.02.30	This information contains
16				confidential, non-public information regarding Meta's internal business
17				strategies and analyses, including
				summaries and discussions of Meta's internal modeling and assessments of
18				its products, services, or advertising
19				platform that reveal competitively sensitive information, including how
20				users or advertisers use and value
21				Meta's products, services, or advertising platform, how they
22				operate, and potential improvements
23				or other product changes. Disclosure of this non-public information is
24				likely to result in competitive harm
				to Meta, as it reveals strategic decision-making which, for example,
25				could give a developer, advertiser, or
26				business partner unfair leverage in competing against or negotiating
27				with Meta.

28 $\frac{1}{\text{No. } 3:20\text{-cv-}08570\text{-JD}}$

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3 4 5 6 7 8 9 0 1	149.	Exhibit O4	Dkt. No. 645-13, Exhibit 31, Excerpts from PALM-010069776, -777-788 (attached slide deck)	This document describes future potential business plans with regard to unreleased products or features. This information contains confidential non-public details of Meta's product functionality and strategic considerations. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors.
12 13 14 15 16 17 18 19	150.	Exhibit O4	Dkt. No. 645-13, Exhibit 31, Excerpts from PALM-010069776, email addresses of Meta employees	This text reveals email addresses or phone numbers of current or former employees of Meta. These current or former employees have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Meta.
220 221 222 223 224 225 226 227 28	151.	Exhibit O5	Dkt. No. 645-13, Exhibit 35, Excerpts from PALM-011140935, text under "Analysis Takeaways"	This text describes the technical function of Meta's advertising platforms and systems. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction, ad targeting and delivery systems, or data tables. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3 4				influence the competitive decision- making and business strategies employed by Meta's competitors in advertising.
5 6 7 8 9 10	152.	Exhibit O6	Dkt. No. 645-13, Exhibit 36, Excerpts from PALM-012003899	This document describes Meta's future potential business plans with respect to compliance with regulatory oversight. This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to product and feature development. This information has never been disclosed publicly. Disclosure of this information would adversely impact
12 13				Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies.
14 15	153.	Exhibit O7	Dkt. No. 645-13, Exhibit 37	This text describes Meta's confidential business strategy regarding data collection, privacy,
16				and security. This information contains non-public information
17				regarding Meta's confidential non- public details of Meta's confidential
18				product functionality and strategic considerations related to feature
19 20				development. This information has never been disclosed publicly.
20				Disclosure of this information would adversely impact Meta's current
22				competitive position by enabling Meta's competitors to mimic its
23				confidential strategies.
24	154.	Exhibit O8	Dkt. No. 645-14, Exhibit 38, Pages -183-185	This text includes descriptions of Meta's business plans for data use
25				design on Meta's Facebook, Instagram, and Messenger apps. This
26 27				information contains confidential, non-public information regarding Meta's internal business strategies

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3				and analyses, including summaries and discussions of Meta's internal
4				modeling and assessments of its
5				products, services, or advertising platform that reveal competitively
6				sensitive information, including how users or advertisers use and value
7				Meta's products, and services how they operate, and potential
8				improvements or other product
9				changes. Disclosure of this non- public information is likely to result
10				in competitive harm to Meta, as it reveals strategic decision-making
11				which, for example, could give a competitor unfair leverage in
12				competing against Meta.
13	155.	Exhibit O8	Dkt. No. 645-14, Exhibit 38, email addresses of Meta	This text reveals email addresses or phone numbers of current or former
14			employees	employees of Meta. These current or former employees have a legitimate,
15				legally recognized privacy interest in
16				protecting their contact information from public disclosure. If their
17				contact information were to be publicly disclosed, they may be
18				subject to repeated inquiries from the press or members of the general
19				public, which could rise to the level
20				of threats or harassment, given the current media attention on Meta.
21	156.	Exhibit O9	Dkt. No. 645-14, Exhibit 39, Excerpts from PALM-	This document describes Meta's
22			012846445	future potential business plans with respect to compliance with
23				regulatory oversight. This information contains non-public
24				information regarding Meta's confidential non-public internal
25				strategic considerations related to
26				product and feature development. This information has never been
27				disclosed publicly. Disclosure of this information would adversely impact
28	No. 3:20-	-cv-08570-JD	-61- D	ECLARATION OF AMRISH ACHARYA ISO

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3 4				Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies.
5 6 7 8 9 10 11 12 13	157.	Exhibit O10	Dkt. No. 645-14, Exhibit 41, Excerpts from PALM-012991911, Pages -912-917 (after "FB App proposal on privacy & trust")	This text describes Meta's future potential business plans and internal analyses regarding privacy policies and practices. This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to feature development. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies.
14 15 16 17 18 19 20	158.	Exhibit O10	Dkt. No. 645-14, Exhibit 41, Excerpts from PALM- 012991911, email addresses of Meta employees	This text reveals email addresses or phone numbers of current or former employees of Meta. These current or former employees have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Meta.
22 23 24 25 26 27	159.	Exhibit O11	Dkt. No. 645-14, Exhibit 42, Excerpts from PALM- 013003886	This document describes Meta's future potential business plans with respect to compliance with EU and India regulatory oversight on data use restrictions. This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to Meta's feature development. This

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3 4 5				information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies.
6 7 8 9 10 11	160.	Exhibit O12	Dkt. No. 645-14, Exhibit 48	This document describes Meta's confidential business plans regarding Meta's data use strategy. This information contains non-public details of Meta's product functionality and strategic considerations. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current
12 13				competitive position by enabling Meta's competitors to mimic its confidential strategies.
14 15	161.	Exhibit O13	Dkt. No. 645-14, Exhibit 54, Excerpts from PALM- 017069195	This document describes Meta's future potential business plans for responding to Apple's App Tracking
16			017007173	Transparency program. This information contains non-public
17				details and confidential data relating to Meta's product functionality and
18 19				strategic considerations. This information has never been disclosed
20				publicly and the Meta product team treats it as strictly confidential. If
21				publicly revealed, this information could influence the competitive
22				decision-making and business strategies employed by Meta's
23	162.	Exhibit O14	Dkt. No. 645-15, Exhibit 62,	competitors. This text reveals information about
2425	- 52.		excerpts of Chen Deposition Transcript, p. 62:7-16	Meta's internal risk assessments and strategies for addressing that risk. This information contains
26 27				confidential, non-public information regarding Meta's internal business strategies and analyses, including

Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
			summaries and discussions of Meta's internal modeling and assessments of
			its products, that reveal
			competitively sensitive information, including how developers use Meta's products, how they operate, and
			potential improvements or other product changes. Disclosure of this
			non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-
			making which, for example, could
			give a developer, unfair leverage in competing against or negotiating
163.	Exhibit O14	Dkt. No. 645-15, Exhibit 62,	with Meta. This text reveals information about
103.	Exhibit O14	excerpts of Chen Deposition Transcript, Pages 92-105	Meta's internal risk assessments and strategies for addressing that risk.
			This information contains confidential, non-public information
			regarding Meta's internal business strategies and analyses, including
			summaries and discussions of Meta's internal modeling and assessments of
			its products, that reveal competitively sensitive information,
			including how developers use Meta's products, how they operate, and
			potential improvements or other
			product changes. Disclosure of this non-public information is likely to
			result in competitive harm to Meta, as it reveals strategic decision-
			making which, for example, could give a developer, unfair leverage in
			competing against or negotiating with Meta.
Ac		otion to File Under Seal Portion ony of Scott Fasser and Joshua	s of Meta's Motion to Exclude the S. Gans (Dkt. No. 646)
164.	Exhibit P1	Dkt. No. 646-5, Exhibit 3, excerpt of Fasser Deposition Transcript, 23:20-24:1	This information reflects and is calculated from internal, nonpublic Meta financial data. Meta spends

28 $\frac{1}{\text{No. } 3:20\text{-cv-}08570\text{-JD}}$

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3				significant resources compiling and maintaining this valuable data,
4				which is non-public, and if revealed
5				to competitors and potential business counterparties, could be used to
6				disadvantage and cause Meta competitive harm by giving
7				competitors insight into confidential Meta financial information. Further,
8				this information reflects sensitive, highly confidential characterizations
9				by Meta's internal business teams
10				that, if revealed, could be referenced by potential counterparties in
11				negotiations with Meta to gain an unfair advantage against Meta.
12	165.	Exhibit P1	Dkt. No. 646-5, Exhibit 3,	This information reflects and is
13			excerpt of Fasser Deposition Transcript, 145:20-146:14	calculated from internal, nonpublic Meta financial data. Meta spends
14			-	significant resources compiling and maintaining this valuable data,
15				which is non-public, and if revealed
16				to competitors and potential business counterparties, could be used to
17				disadvantage and cause Meta competitive harm by giving
18				competitors insight into confidential Meta financial information. Further,
19				this information reflects sensitive,
20				highly confidential characterizations by Meta's internal business teams
21				that, if revealed, could be referenced by potential counterparties in
22				negotiations with Meta to gain an unfair advantage against Meta.
23	166.	Exhibit P1	Dkt. No. 646-5, Exhibit 3,	This information reflects and is
24			excerpt of Fasser Deposition Transcript, 148:2-5	calculated from internal, nonpublic Meta financial data. Meta spends
25			114110011рц 170.2 3	significant resources compiling and
26				maintaining this valuable data, which is non-public, and if revealed
27				to competitors and potential business counterparties, could be used to
28	No. 3:20-	ev-08570-JD	-65- D	DECLARATION OF AMRISH ACHARYA ISO

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3				disadvantage and cause Meta competitive harm by giving
4				Meta financial information. Further,
5				this information reflects sensitive, highly confidential characterizations by Meta's internal business teams
7				that, if revealed, could be referenced by potential counterparties in
8				negotiations with Meta to gain an unfair advantage against Meta.
9	167.	Exhibit P1	Dkt. No. 646-5, Exhibit 3,	This information reflects and is
10			excerpt of Fasser Deposition Transcript, 150:2-7	calculated from internal, nonpublic Meta financial data. Meta spends
11				significant resources compiling and maintaining this valuable data,
12				which is non-public, and if revealed to competitors and potential business
13				counterparties, could be used to disadvantage and cause Meta
14 15				competitive harm by giving
16				competitors insight into confidential Meta financial information. Further,
17				this information reflects sensitive, highly confidential characterizations
18				by Meta's internal business teams that, if revealed, could be referenced
19				by potential counterparties in negotiations with Meta to gain an
20	1.60	F 1 1 1 1 P2		unfair advantage against Meta.
21	168.	Exhibit P2	Dkt. No. 646-11, Exhibit 9, excerpts of Bosworth	This text reveals confidential information about the technical
22			Deposition Transcript, 174:1-8	functionalities of Meta's ad auction. This information contains
23				confidential, proprietary, and commercially sensitive information
24				regarding the technical functionalities and processes of
25				Meta's ad auction. This information
26				has never been disclosed publicly and Meta's product team treats it as
27				strictly confidential. If publicly revealed, this information could

28 $\frac{1}{\text{No. } 3:20-\text{cv}-08570-\text{JD}}$

	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
				influence the competitive decision- making and business strategies employed by Meta's competitors in advertising.
	169.	Exhibit P3	Dkt. No. 646-12, Exhibit 10, excerpts of Goldman Deposition Transcript, 26:19-22	This text reveals confidential information about the technical functionalities of Meta's ad auction. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
	170.	Exhibit P4	Dkt. No. 646-13, Exhibit 11, excerpts of Baser Deposition Transcript, 275:8-13	This information contains confidential, non-public information regarding Meta's internal business strategies and analyses, including
				summaries and discussions of Meta's internal modeling and assessments of
				its products, that reveal competitively sensitive information,
				including how users use and value Meta's products, services, or
				advertising platform, how they operate, and potential improvements
				or other product changes. Disclosure of this non-public information is
				likely to result in competitive harm
				to Meta, as it reveals strategic decision-making which, for example,
				could give a developer unfair leverage in competing against or
Ш		1		negotiating with Meta.

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3 4	171.	Exhibit P4	Dkt. No. 646-13, Exhibit 11, excerpts of Baser Deposition Transcript, 278:22-23	This information contains confidential, proprietary, and commercially sensitive information
5			• '	regarding the technical functionalities and processes of
6				Meta's ad auction. This information has never been disclosed publicly
7				and Meta's product team treats it as strictly confidential. If publicly
8				revealed, this information could influence the competitive decision-
9				making and business strategies employed by Meta's competitors in
11	172.	Exhibit P4	Dirt No. 646 12 Euhihit 11	advertising. This information contains
12	1/2.	Exmon F4	Dkt. No. 646-13, Exhibit 11, excerpts of Baser Deposition Transcript, 279:5-17	confidential, proprietary, and
13			Transcript, 2/9.3-1/	commercially sensitive information regarding the technical
14				functionalities and processes of Meta's ad auction. This information
15				has never been disclosed publicly and Meta's product team treats it as
16				strictly confidential. If publicly revealed, this information could
17 18				influence the competitive decision- making and business strategies
19				employed by Meta's competitors in advertising.
20 21			Motion to File Under Seal Certa d Z. Gringer in Support of Meta of Nicholas Economides (De	's Motion to Exclude the Testimony
22	173.	Exhibit Q1	Dkt. No. 655-3, Exhibit 8, excerpts of Zuckerberg	This document describes future potential business plans with regard
23			Deposition Transcript, Pages 52-53	to unreleased products or features. This information contains
24			32-33	confidential non-public details of
25				Meta's product functionality and strategic considerations related to
26				feature development. This information has never been disclosed
27				publicly and Meta's product team treats it as strictly confidential. If
28	No. 3:20-	cv-08570-JD	-68- D	ECLARATION OF AMRISH ACHARYA ISO

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3				publicly revealed, this information could influence the competitive
5				decision-making and business strategies employed by Meta's competitors.
6	174.	Exhibit Q2	Dkt. No. 655-4, Exhibit 9,	This document describes future
7			excerpts of Baser Deposition Transcript, 269:24-273:25	potential business plans with regard to unreleased products or features.
8				This information contains confidential non-public details of
9				Meta's product functionality and strategic considerations related to
10				feature development. This information has never been disclosed
11				publicly and Meta's product team treats it as strictly confidential. If
12				publicly revealed, this information could influence the competitive
13 14				decision-making and business strategies employed by Meta's
15				competitors.
16	Int		trative Motion to File Under Sea Testimony of Scott Fasser and Jo	l Opposition to Meta's Motion to shua Gans (Dkt. No. 667)
17	175.	Exhibit R1	Dkt. No. 667-1, Advertisers' Opp to Motion to Exclude	This text describes confidential pricing information. This
18			Testimony of Fasser, 1:20-24, between "(Ex. 1, ¶¶ 6-7)" and	information reveals Meta's internal non-public pricing information for
19			"Id., ¶¶ 7-11"	advertising on Meta's products or services, including how those prices
20				can be determined. This information
21				is not otherwise publicly reported by the company and disclosure is likely
22				to cause Meta competitive harm and give its competitors an unfair
23				advantage. Meta's competitors could improperly utilize this internal, non-
24				public information to modify or augment their business operations in
25				an effort to compete unfairly against Meta
26				IVICIA

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3	176.	Exhibit R1	Dkt. No. 667-1, Advertisers' Opp to Motion to Exclude	This text describes confidential pricing information. This
5			Testimony of Fasser, 5:18-21	information reveals Meta's internal non-public pricing information for
6				advertising on Meta's products or services, including how those prices can be determined. This information
7				is not otherwise publicly reported by the company and disclosure is likely
8				to cause Meta competitive harm and give its competitors an unfair
9				advantage. Meta's competitors could improperly utilize this internal, non-
10 11				public information to modify or augment their business operations in
12				an effort to compete unfairly against Meta.
13	177.	Exhibit R1	Dkt. No. 667-1, Advertisers'	This text describes confidential
14			Opp to Motion to Exclude Testimony of Fasser, 6:1-4	pricing information. This information reveals Meta's internal
15				non-public pricing information for advertising on Meta's products or services, including how those prices
16				can be determined. This information is not otherwise publicly reported by
17 18				the company and disclosure is likely to cause Meta competitive harm and
19				give its competitors an unfair advantage. Meta's competitors could
20				improperly utilize this internal, non- public information to modify or
21				augment their business operations in an effort to compete unfairly against
22				Meta.
23	178.	Exhibit R1	Dkt. No. 667-1, Advertisers' Opp to Motion to Exclude	This text describes confidential pricing information. This
24			Testimony of Fasser, 6:6-7	information reveals Meta's internal non-public pricing information for
2526				advertising on Meta's products or services, including how those prices
26				can be determined. This information is not otherwise publicly reported by
28	No. 3:20	ev-08570-JD	-70- D	the company and disclosure is likely ECLARATION OF AMRISH ACHARYA ISO

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3 4 5 6				to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public information to modify or augment their business operations in an effort to compete unfairly against Meta.
88 99 00 11 122 133 14 15 16 16 17 17 17 18 18 18 18 18 18 18 18 18 18 18 18 18	179.	Exhibit R1	Dkt. No. 667-1, Advertisers' Opp to Motion to Exclude Testimony of Fasser, 7:24-8:2	This text describes confidential pricing information. This information reveals Meta's internal non-public pricing information for advertising on Meta's products or services, including how those prices can be determined. This information is not otherwise publicly reported by the company and disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public information to modify or augment their business operations in an effort to compete unfairly against Meta.
8 9 0 1 1 2 2 3 3 4 4 5 5 6 6 7 7	180.	Exhibit R2	Dkt. No. 667-4, Exhibit 3	This document describes confidential pricing information. This information reveals Meta's internal non-public pricing information for advertising on Meta's products or services, including how those prices can be determined. This information is not otherwise publicly reported by the company and disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public information to modify or augment their business operations in an effort to compete unfairly against Meta.

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
33 44 55 66 77 88 99 00	181.	Exhibit R3	Dkt. No. 667-6, Exhibit 5	This document describes confidential pricing information. This information reveals Meta's internal non-public pricing information for advertising on Meta's products or services, including how those prices can be determined. This information is not otherwise publicly reported by the company and disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-
1 2				public information to modify or augment their business operations in an effort to compete unfairly against Meta.
3 4 5	182.	Exhibit R4	Dkt. No. 667-7, Exhibit 6	This document describes confidential pricing information. This information reveals Meta's internal non-public pricing
6 7				information for advertising on Meta's products or services, including how those prices can be determined. This information is not
8 9				otherwise publicly reported by the company and disclosure is likely to cause Meta competitive harm and
)				give its competitors an unfair advantage. Meta's competitors could
1 2				improperly utilize this internal, non- public information to modify or augment their business operations in
3				an effort to compete unfairly against Meta.
4 5	183.	Exhibit R5	Dkt. No. 667-8, Exhibit 7	This document describes confidential pricing information. This information reveals Meta's
6 7				internal non-public pricing information for advertising on Meta's products or services,
3	No. 3:20-	cv-08570-JD	-72- D	including how those prices can be ECLARATION OF AMRISH ACHARYA ISC

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3				determined. This information is not otherwise publicly reported by the
4				company and disclosure is likely to cause Meta competitive harm and
5				give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-
7				public information to modify or augment their business operations in
8				an effort to compete unfairly against Meta.
9	184.	Exhibit R6	Dkt. No. 667-9, Exhibit 8	This document describes
10				confidential financial information. This information reveals Meta's
11 12				internal non-public profit, revenue, and financial calculations. These
13				data sets are not otherwise publicly reported by the company and their
14				disclosure is likely to cause Meta competitive harm and give its
15				competitors an unfair advantage. Meta's competitors could improperly
16				utilize this internal, non-public data
17				to modify or augment their business operations in an effort to compete
18				unfairly against Meta. Moreover, visibility into the trends in the data
19				(i.e., figures across multiple years) gives Meta's competitors improper
20				insight into the financial health and future outlook of Meta's product
21				development, which also arguably
22				gives Meta's competitors an unfair advantage.
23	Interi		ive Motion to File Under Seal O	pposition to Users' Motion for Class hibits (Dkt. No. 669)
24	185.	Exhibit S1	Dkt. No. 669-1, Meta's Opp to	This text describes Meta's future
25			Users' Motion for Class Cert, 8:27-9:3	potential business plans regarding data collection from users. This
26				information contains non-public information regarding Meta's
27				confidential non-public internal

-73-

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3				strategic considerations related to creating value for and attracting
4				users to Meta's products. This information has never been disclosed
5				publicly. Disclosure of this information would adversely impact
6				Meta's current competitive position by enabling Meta's competitors to
7 8				mimic its confidential strategies in an effort to attract users away from
				Meta.
9	186.	Exhibit S2	Dkt. No. 669-13, Exhibit 12	This document describes future
10				potential business plans with regard to unreleased products and features.
11				This information contains confidential non-public details of
12				Meta's product functionality and
13				strategic considerations related to feature development. This
14				information has never been disclosed
15				publicly and Meta's product team treats it as strictly confidential. If
16				publicly revealed, this information could influence the competitive
17				decision-making and business
18				strategies employed by Meta's competitors.
19	Inter	rim Administra	ative Motion to File Under Seal (Opposition to Advertiser Plaintiffs'
			lass Certification and Accompar	
20	187.	Exhibit T1	Dkt. No. 671-1, Meta Opp to Advertisers' Class Cert Motion,	This information contains confidential, proprietary, and
21			7:4-6	commercially sensitive information regarding the technical
22				functionalities and processes of
23				Meta's ad auction. This information has never been disclosed publicly
24				and Meta's product team treats it as
25				strictly confidential. If publicly revealed, this information could
26				influence the competitive decision-
27				making and business strategies

-74-

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3				employed by Meta's competitors in advertising.
4 5 6 7 8 9 10 11 12 13 14 15	188.	Exhibit T1	Dkt. No. 671-1, Meta Opp to Advertisers' Class Cert Motion, 15:12 from "Custom" to "class period"	This information reflects and is calculated from internal, nonpublic Meta financial data. Meta spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Meta competitive harm by giving competitors insight into confidential Meta financial information. Further, this information reflects sensitive, highly confidential characterizations by Meta's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Meta to gain an unfair advantage against Meta.
15 16 17 18	189.	Exhibit T1	Dkt. No. 671-1, Meta Opp to Advertisers' Class Cert Motion, 15:20 from "was associated" to "spend"	This information reflects and is calculated from internal, nonpublic Meta financial data. Meta spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed
19				to competitors and potential business counterparties, could be used to disadvantage and cause Meta
20 21				competitive harm by giving competitors insight into confidential
22				Meta financial information. Further, this information reflects sensitive,
23				highly confidential characterizations by Meta's internal business teams
24				that, if revealed, could be referenced by potential counterparties in
25				negotiations with Meta to gain an unfair advantage against Meta.
26 27	190.	Exhibit T1	Dkt. No. 671-1, Meta Opp to Advertisers' Class Cert Motion,	This information reflects and is calculated from internal, nonpublic

	No.	Document Sought to Be Sealed	Basis for Sealing
		15:22 from "made up" to "class period"	Meta financial data. Meta spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential busines counterparties, could be used to disadvantage and cause Meta competitive harm by giving competitors insight into confidential Meta financial information. Further, this information reflects sensitive, highly confidential characterizations by Meta's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Meta to gain an unfair advantage against Meta.
191.	Exhibit T2	Dkt. No. 671-2, Exhibit 1, excerpts of Fasser Deposition Transcript, 145:20-146:14	This information reflects and is calculated from internal, nonpublic Meta financial data. Meta spends significant resources compiling and
			maintaining this valuable data, which is non-public, and if revealed to competitors and potential busines
			counterparties, could be used to disadvantage and cause Meta competitive harm by giving competitors insight into confidential
			Meta financial information. Further, this information reflects sensitive,
			highly confidential characterizations by Meta's internal business teams
			that, if revealed, could be referenced by potential counterparties in
			negotiations with Meta to gain an unfair advantage against Meta.
192.	Exhibit T2	Dkt. No. 671-2, Exhibit 1, excerpts of Fasser Deposition	This information reveals Meta's internal non-public pricing
		Transcript, 148:2-5	information for advertising on Meta's products or services,
			including how those prices can be determined. This information is not

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3				company and disclosure is likely to cause Meta competitive harm and
4				give its competitors an unfair advantage. Meta's competitors could
5				improperly utilize this internal, non- public information to modify or augment their business operations in
7				an effort to compete unfairly against Meta.
8	193.	Exhibit T3	Dkt. No. 671-3, Exhibit 2,	This document describes Meta's
9			Advertiser Plaintiffs' Corrected First Supp Responses and	assessments of business risks and potential strategies to address risks.
10			Objections	This information contains confidential, non-public information
11				regarding Meta's internal business strategies and analyses, including
12 13				summaries and discussions of Meta's internal modeling and assessments of
14				its products, services, or advertising platform that reveal competitively
15				sensitive information, including how users or advertisers use and value
16				Meta's products, services, or advertising platform, how they
17				operate, and potential improvements or other product changes. Disclosure
18				of this non-public information is likely to result in competitive harm
19				to Meta, as it reveals strategic decision-making which, for example,
20				could give a developer, advertiser, or
21				business partner unfair leverage in competing against or negotiating
22	194.	Exhibit T4	Dkt. No. 671-10, Exhibit 9,	with Meta. This information reveals Meta's
23 24			Excerpts of Williams Deposition Transcript, 88:3-	internal non-public profit, revenue, and financial calculations. These
25			89:25	data sets are not otherwise publicly reported by the company and their
26				disclosure is likely to cause Meta
27				competitive harm and give its competitors an unfair advantage.
•				Meta's competitors could improperly

28

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3				utilize this internal, non-public data to modify or augment their business
4				operations in an effort to compete unfairly against Meta. Moreover,
5				visibility into the trends in the data
6				(i.e., figures across multiple years) gives Meta's competitors improper
7				insight into the financial health and future outlook of Meta's product
8				development or advertising business, which also arguably gives Meta's
9				competitors an unfair advantage.
10	195.	Exhibit T4	Dkt. No. 671-10, Exhibit 9, Excerpts of Williams	This information contains confidential, proprietary, and
11			Deposition Transcript, 115:1-5	commercially sensitive information regarding the technical
12				functionalities and processes of
13				Meta's ad auction. This information has never been disclosed publicly
14				and Meta's product team treats it as strictly confidential. If publicly
15				revealed, this information could influence the competitive decision-
16				making and business strategies employed by Meta's competitors in
17				advertising.
18	196.	Exhibit T4	Dkt. No. 671-10, Exhibit 9, Excerpts of Williams	This information reveals Meta's internal non-public pricing
19			Deposition Transcript, 157:4-14	information for advertising on
20				Meta's products or services, including how those prices can be
21				determined. This information is not otherwise publicly reported by the
22				company and disclosure is likely to
23				cause Meta competitive harm and give its competitors an unfair
24				advantage. Meta's competitors could improperly utilize this internal, non-
25				public information to modify or
26				augment their business operations in an effort to compete unfairly against
27				Meta.

Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
197.	Exhibit T4	Dkt. No. 671-10, Exhibit 9, Excerpts of Williams	This information reveals Meta's internal non-public profit, revenue,
		Deposition Transcript, 163:2-7	and financial calculations. These
			data sets are not otherwise publicly reported by the company and their
			disclosure is likely to cause Meta competitive harm and give its
			competitors an unfair advantage. Meta's competitors could improperly
			utilize this internal, non-public data
			to modify or augment their business operations in an effort to compete
			unfairly against Meta. Moreover, visibility into the trends in the data
			(i.e., figures across multiple years)
			gives Meta's competitors improper insight into the financial health and
			future outlook of Meta's product development or advertising business,
			which also arguably gives Meta's
			competitors an unfair advantage.
			aterials ISO Consumers' Opposition cholas Economides (Dkt. No. 673)
198.	Exhibit U1	Dkt. No. 673-1, Consumers'	This document describes future
		Opp to Motion to Exclude Testimony of Nicholas	potential business plans with regard to unreleased products or features.
		Economides, 3:9-17	This information contains confidential non-public details of
			<u> </u>
			Meta's product functionality and
			strategic considerations related to feature development. This
			strategic considerations related to feature development. This information has never been disclosed
			strategic considerations related to feature development. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If
			strategic considerations related to feature development. This information has never been disclosed publicly and Meta's product team
			strategic considerations related to feature development. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business
			strategic considerations related to feature development. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3				This information contains confidential non-public details of
4				Meta's product functionality and
5				strategic considerations related to feature development. This
6				information has never been disclosed publicly and Meta's product team
7				treats it as strictly confidential. If publicly revealed, this information
8				could influence the competitive decision-making and business
9				strategies employed by Meta's
10	200.	Exhibit U3	Dkt. No. 673-5, Exhibit 9, PX-	competitors. This document describes future
11	200.	Emileit 03	1097 Levy Deposition	potential business plans with regard to unreleased products or features.
12				This information contains
13				confidential non-public details of Meta's product functionality and
14				strategic considerations related to feature development. This
15				information has never been disclosed
16				publicly and Meta's product team treats it as strictly confidential. If
17				publicly revealed, this information could influence the competitive
18				decision-making and business strategies employed by Meta's
19				competitors.
20	201.	Exhibit U4	Dkt. No. 673-6, Exhibit 10, PX-2423 Egan Deposition	This document describes future potential business plans with regard
21				to unreleased products or features. This information contains
22				confidential non-public details of
23				Meta's product functionality and strategic considerations related to
24				feature development. This information has never been disclosed
25				publicly and Meta's product team treats it as strictly confidential. If
26				publicly revealed, this information
27				could influence the competitive decision-making and business

28

Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
			strategies employed by Meta's competitors.
202.	Exhibit U5	Dkt. No. 673-7, Exhibit 11, PX-2214 Naveh Deposition	This document describes future potential business plans with regard to unreleased products or features. This information contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors.
203.	Exhibit U6	Dkt. No. 673-8, Exhibit 12, Excerpts from PX-2254 Zuckerberg Deposition PALM- 013818575	This document describes future potential business plans with regard to unreleased products or features. This information contains confidential non-public details of Meta's product functionality and strategic considerations related to feature development. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors.
Int		rative Motion to File Under Seal aintiffs' Motion to Exclude Tuck	Meta's Opposition to Advertiser ker (Dkt. No. 675)
204.	Exhibit V	Dkt. No. 675-11, Exhibit 10, Excerpts of Schultz Deposition Transcript	This document describes technical aspects of Meta's data infrastructure. This information contains confidential, proprietary, and commercially sensitive information

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3				functionalities and processes of Meta's data processing systems. This information has never been disclosed
5				publicly and Meta's product team treats it as strictly confidential. If
6				publicly revealed, this information could influence the competitive decision-making and business
7 8				strategies employed by Meta's competitors in advertising.
9	Inter		ative Motion to File Under Seal A lotion to Exclude Kreitzman and	Advertiser Plaintiffs' Opposition to Williams (Dkt. No. 679)
10	205.	Exhibit W1	Dkt. No. 679-5, Exhibit 12	This document reveals confidential financial information. This
11				information reveals Meta's internal non-public profit, revenue, and
12				financial calculations. These data sets are not otherwise publicly
13				reported by the company and their
15				disclosure is likely to cause Meta competitive harm and give its
16				competitors an unfair advantage. Meta's competitors could improperly
17				utilize this internal, non-public data to modify or augment their business
18				operations in an effort to compete unfairly against Meta. Moreover,
19				visibility into the trends in the data
20				(i.e., figures across multiple years) gives Meta's competitors improper
21				insight into the financial health and future outlook of Meta's product
22				development and advertising business, which also arguably gives
23				Meta's competitors an unfair advantage.
24	206.	Exhibit W2	Dkt. No. 679-6, Exhibit 13	This document reveals confidential
25				financial information. This information reveals Meta's internal
26				non-public profit, revenue, and financial calculations. These data
27				sets are not otherwise publicly

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3				reported by the company and their disclosure is likely to cause Meta
4				competitive harm and give its competitors an unfair advantage.
5				Meta's competitors could improperly utilize this internal, non-public data
6				to modify or augment their business
7				operations in an effort to compete unfairly against Meta. Moreover,
8				visibility into the trends in the data (i.e., figures across multiple years)
9				gives Meta's competitors improper insight into the financial health and
10				future outlook of Meta's product
11				development and advertising business, which also arguably gives
12				Meta's competitors an unfair advantage.
13	Interi	m Administra		Ieta's Reply ISO Motion to Exclude
14			Fasser and Gans (Dkt. N	,
15	207.	Exhibit X	Dkt. No. 683-4, Exhibit 16, Excerpts from the Gans	This document describes specific contract terms between Meta and an
16			Deposition Transcript, 275:14-16	advertiser. This text contains non- public and confidential information
17			10	regarding Meta's agreements with an
18				advertiser as well as internal strategy relating to those agreements.
19				Disclosure of this non-public information is likely to result in
20				competitive harm to Meta, as it
21				reveals strategic decision-making which, for example, could give an
22				advertiser unfair leverage in competing against or negotiating
23				with Meta. Moreover, Meta's competitors could use this non-party
24				information to unfairly target Meta's
25				advertisers and offer specific deal terms designed to undercut those
26	-			offered by Meta.
27	Int	erim Administ	rative Motion to File Under Seal Motion for Class Certification	Advertiser Plaintiffs' Reply ISO (Dkt. No. 688)

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3	208.	Exhibit Y1	Dkt. No. 688-5, Exhibit 6, Excerpts from the 30(b)(1)	This document describes technical aspects of Meta's data infrastructure.
4			Deposition of Alex Schultz	This information contains confidential, proprietary, and
5				commercially sensitive information regarding the technical
6				functionalities and processes of
7				Meta's data processing systems. This information has never been disclosed
8				publicly and Meta's product team treats it as strictly confidential. If
10				publicly revealed, this information could influence the competitive
11				decision-making and business strategies employed by Meta's
12	209.	Exhibit Y2	Dist No. 600 7 Eurhibit 0	competitors in advertising. This document reveals confidential
13	209.	Exhibit 12	Dkt. No. 688-7, Exhibit 8, PALM-003309653	financial information. This
14				information reveals Meta's internal non-public profit, revenue, and
15				financial calculations. These data sets are not otherwise publicly
16				reported by the company and their disclosure is likely to cause Meta
17				competitive harm and give its competitors an unfair advantage.
18				Meta's competitors could improperly utilize this internal, non-public data
19				to modify or augment their business
20				operations in an effort to compete unfairly against Meta. Moreover,
21				visibility into the trends in the data (i.e., figures across multiple years)
22				gives Meta's competitors improper insight into the financial health and
23				future outlook of Meta's product
24				development and advertising business, which also arguably gives
25				Meta's competitors an unfair advantage.
26	210.	Exhibit Y3	Dkt. No. 688-8, Exhibit 9,	This document describes specific
27			PALM-005037545	contract terms between Meta and an advertiser. This text contains non-
28	No. 3:20	-cv-08570-JD		ECLARATION OF AMRISH ACHARYA ISO OMNIBUS MOTION TO SEAL MATERIALS

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3				public and confidential information regarding Meta's agreements with an
4				advertiser as well as internal strategy
5				relating to those agreements. Disclosure of this non-public information is likely to result in
6				competitive harm to Meta, as it reveals strategic decision-making
7				which, for example, could give an
8				advertiser unfair leverage in competing against or negotiating
9				with Meta. Moreover, Meta's competitors could use this non-party
10				information to unfairly target Meta's advertisers and offer specific deal
11				terms designed to undercut those
12	211.	Exhibit Y4	Dirt No. 600 0 Embibit 10	offered by Meta. This document describes
13	211.	EXIIIOII 14	Dkt. No. 688-9, Exhibit 10, PALM-013912488	confidential information on the
14				functionality of Meta's advertising products and services. This
15				information contains confidential, proprietary, and commercially
16				sensitive information regarding the technical functionalities and
17				processes of Meta's ad targeting and
18				delivery systems. This information has never been disclosed publicly
19				and Meta's product team treats it as strictly confidential. If publicly
20				revealed, this information could influence the competitive decision-
21				making and business strategies employed by Meta's competitors in
22				advertising.
23	212.	Exhibit Y5	Dkt. No. 688-10, Exhibit 11, PALM-000777305	This document describes confidential information on the
24			1 ALIVI-000 / / / 303	functionality of Meta's advertising
25				products and services. This information contains confidential,
26				proprietary, and commercially sensitive information regarding the
27				technical functionalities and

28

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
3 4				processes of Meta's ad targeting and delivery systems. This information has never been disclosed publicly
5				and Meta's product team treats it as strictly confidential. If publicly revealed, this information could
6 7				influence the competitive decision- making and business strategies employed by Meta's competitors in
8				advertising.
9	Interim Administrative Motion to File Under Seal Reply in Suppo Exclude the Testimony of Nicholas Economides and Accompanyi			
10	213.	Exhibit Z	694) Dkt. No. 694-1, Meta's Reply	This text describes confidential
11 12	213.	Exmort Z	ISO Meta's Motion to Exclude the Testimony of Nicholas	financial information and data relating to Meta's advertising
13			Economides, 4:23-24, between "was" and "offers"	products. Meta spends significant resources compiling and maintaining
14				this valuable data, which is non- public, and if revealed to competitors
15				and potential business counterparties, could be used to
16				disadvantage and cause Meta competitive harm by giving
17 18				competitors insight into confidential Meta financial information.
19	214.	Exhibit Z	Dkt. No. 694-1, Meta's Reply ISO Meta's Motion to Exclude	This document describes future potential business plans with regard
20			the Testimony of Nicholas Economides, 5:8-25 (quotations	to unreleased products or features. This information contains
21			from PALM Bates-stamped documents)	confidential non-public details of Meta's product functionality and
22				strategic considerations related to feature development. This
23 24				information has never been disclosed publicly and Meta's product team
25				treats it as strictly confidential. If publicly revealed, this information
26				could influence the competitive decision-making and business
27				strategies employed by Meta's competitors.

1 2	Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing		
3	Interi	Interim Administrative Motion to File Under Seal Advertiser Plaintiffs' Corrected Reply ISO Motion for Class Certification (Dkt. No. 699)				
5	215.	Exhibit AA1	Dkt. No. 699-5, Exhibit 6, Excerpts from the 30(b)(1) Deposition of Alex Schultz	This document describes technical aspects of Meta's data infrastructure. This information contains		
6 7				confidential, proprietary, and commercially sensitive information regarding the technical		
8				functionalities and processes of Meta's data processing systems. This		
9				information has never been disclosed publicly and Meta's product team		
10				treats it as strictly confidential. If publicly revealed, this information		
11				could influence the competitive decision-making and business		
13				strategies employed by Meta's competitors in advertising.		
14	216.	Exhibit AA2	Dkt. No. 699-7, Exhibit 8, PALM-003309653	This document reveals confidential financial information. This		
15		71112	THEM 003309033	information reveals Meta's internal non-public profit, revenue, and		
16				financial calculations. These data sets are not otherwise publicly		
17				reported by the company and their		
18				disclosure is likely to cause Meta competitive harm and give its		
19				competitors an unfair advantage. Meta's competitors could improperly		
20 21				utilize this internal, non-public data to modify or augment their business		
22				operations in an effort to compete unfairly against Meta. Moreover,		
23				visibility into the trends in the data (i.e., figures across multiple years)		
24				gives Meta's competitors improper insight into the financial health and		
25				future outlook of Meta's product development and advertising		
26				business, which also arguably gives Meta's competitors an unfair		
27				advantage.		

-87-

28 $\frac{1}{\text{No. } 3:20\text{-cv-}08570\text{-JD}}$

Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
217.	Exhibit AA3	Dkt. No. 699-8, Exhibit 9, PALM-005037545	This document describes specific contract terms between Meta and an advertiser. This text contains non-public and confidential information regarding Meta's agreements with a advertiser as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an advertiser unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's advertisers and offer specific deal terms designed to undercut those offered by Meta.
218.	Exhibit AA4	Dkt. No. 699-9, Exhibit 10, PALM-013912488	This document describes confidential information on the functionality of Meta's advertising products and services. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad targeting and delivery systems. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
219.	Exhibit AA5	Dkt. No. 699-10, Exhibit 11, PALM-000777305	This document describes confidential information on the functionality of Meta's advertising products and services. This information contains confidential,

Case 3:20-cv-08570-JD Document 711-1 Filed 11/21/23 Page 90 of 92

Row No.	Vanderslice Decl. Ex. No.	Document or Portion of Document Sought to Be Sealed	Basis for Sealing
			proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad targeting and delivery systems. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.

Case 3:20-cv-08570-JD Document 711-1 Filed 11/21/23 Page 91 of 92

I declare that the foregoing is true and correct under penalty of perjury. Executed on this 20th day of November, 2023, in San Francisco, California. By: Amrish Acharya

 $\frac{1}{\text{No. } 3:20-\text{cv-}08570-\text{JD}}$

SIGNATURE ATTESTATION This document is being filed through the Electronic Case Filing (ECF) system by attorney Sonal N. Mehta. By her signature, Ms. Mehta attests that she has obtained concurrence in the filing of this document from the signatory. /s/ Sonal N. Mehta Sonal N. Mehta By:

No. 3:20-cv-08570-JD